

# Celsius Privacy Policy

## Introduction

Celsius Network LLC (“us“, “we” or “**Company**“), 50 Harrison St, Suite 209F, Hoboken NJ 07030, respects the privacy of our users (each, “you” or “**User**“) and is committed to protecting the privacy of Users who access, download, install or register to our mobile or web application (the “**Application**“), our website or any other online services we provide (collectively: the “**Services**“). This Privacy Policy outlines our practices with respect to collecting, using and disclosing your information when you use the Services. We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using the Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to the Privacy Policy. The Privacy Policy is a part of the Terms of Service and is incorporated therein by reference.

This Privacy Policy contains information on our use of your personal information in accordance with relevant laws and regulations, including, where applicable, the EU General Data Protection Regulation (2016/679) (the “**EU GDPR**“), the EU GDPR such as it forms part of the laws of the United Kingdom (“**UK**“) by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (the “**UK GDPR**“), the UK Data Protection Act 2018 and the California Consumer Privacy Act of 2018 (“**CCPA**“). The rights discussed in certain sections of this Privacy Policy may be subject to exemptions or other limitations under applicable law.

For users who are located in the European Economic Area (“**EEA**“) and/or the UK and subject to the EU GDPR and/or the UK GDPR (together, the “**GDPR**“), please review this Privacy Policy



and see the below Section, “**EU/UK Based Users and the GDPR**” for a description of your rights and other information related to the GDPR.

For users who are California residents and subject to the CCPA, please review this Privacy Policy and see the below Section, “**Additional Information for California Residents**” for a description of your rights with regard to your personal information (as defined by the CCPA), additional disclosures, and our notice at collection.

In this Privacy Policy you will read about, among other things:

- What Type of Information We Collect
- Sources of Personal Information
- How We Use the Information
- With Whom We Share the Information and For What Purpose
- Corporate Transaction
- Third-Party Collection of Information
- Cookies and Google Analytics
- Advertisements and Advertising Tools
- For How Long We Retain Your Information
- How We Protect Your Information
- Minors
- EU/UK Based Users and the GDPR
- Additional Information for California Residents
- Updates or Amendments to the Privacy Policy
- How to Contact Us

## **What Type of Information We Collect**

In general, we collect information, including Personal Information, when you communicate with us and when you use our Services. The information we request from you will be the minimum required to provide you with our services. When we use the term “**Personal Information**” we mean any information about an individual from which that person can be identified. Information that is anonymous, aggregated, or deidentified is generally not considered Personal Information.



There are instances where we invite or request individuals to provide us with their Personal Information through our Application, website or otherwise (e.g. by email), and we may also collect some information automatically. Through your use of our Services and your interactions with us, you may provide us with Personal Information including:

- **Identifiers and similar information** such as, name, address, date of birth, email address, social security number, driver's license number, passport number, online identifiers, or other similar identifiers;
- **Certain information protected under federal or state laws** such as a signature or bank account or other financial information;
- **Characteristics of protected classifications** under certain federal or state laws, including gender, national origin, or marital status;
- **Commercial information**, including records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies;
- **Internet or other electronic network activity information**, including interactions with our website or use of certain online tools;
- **Geolocation data**, such as information about your location or the location of your device;
- **Audio, electronic, visual**, or similar information, which could be collected during audio or video calls (including video conferences and similar functions);
- **Biometric data**, such as images, which may constitute biometric data in certain jurisdictions. We may use such data for the purpose of identification for fraud and anti-money laundering checks;
- **Professional or employment-related information**, including occupation, compensation, employer, and title;
- **Inferences drawn from any of the information identified above** to create a profile reflecting your preferences or similar information; and

## Sources of Personal Information

We collect Personal Information about you directly from you and/or your intermediaries through sources on our website, our Application, when you register or sign-in to the Services via your social network account, including when the following happens:

- **Signing up for an account:** When you sign-up and register for the Services, you will be asked to provide us certain details about yourself. You may register for the Services

through your social network account or directly through the Application or our website (if applicable).

- **Registering through social network account:** When you register or sign-in to the Services via your social network account (e.g., Facebook, Twitter, etc.), we will have access to basic information from your social network account, such as your full name, home address, email address, birthdate, profile picture, friends list, personal description, as well as any other information you made publicly available on such account or agreed to share with us. At all times, we will abide by the terms, conditions and restrictions of the social network platform.
- **Registering through the Application or our website (if applicable):** When you register for the Services through the Application or our website, we may collect from you the following information: full name, email address, home address, hometown, nationality, birthdate, phone number, as well as information required for our compliance with regulatory Know Your Customer requirements, such as passport or other identification number, and any other information you agreed to share with us.
- **Voluntarily provided information:** We may collect information which you provide us voluntarily. For instance, when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services. We may also collect the feedback, suggestions, complaints and reports which you send to us. Please note that we may also collect complaints about you from other Users, which may include your Personal Information.
- **Communication Recording:** We may record communications between you and any of our representatives and/or other participants, including recordings of audio, video and video conference calls, conversations or communications. We may collect this information for the purpose of resolving complaints, or for the purpose of improving the overall quality of the Services, for training and/or instructional purposes, record keeping or otherwise in order to comply with a legal or regulatory requirement to which we are subject.
- **Device information:** We may collect Personal Information from your device. Such information may include geolocation data, IP address, unique identifiers (e.g., MAC address and UUID) as well as other information which relates to your activity through the Services.

For the avoidance of doubt, if we combine Personal Information with non-personal information, the combined information will be treated as Personal Information as long as it remains combined.

In addition, we may collect Personal Information from different sources, such as: our affiliates, our service providers, or our affiliates' service providers; public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies



and departments, and regulatory authorities; and/or from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud or financial crimes. The relevant source may be responsible for obtaining the relevant consents from you (where applicable) to ensure you are happy with the ways in which your Personal Information will be used.

## **How We Use the Information**

We use and share Personal Information in the manners described in this Privacy Policy. In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for our business or commercial purposes such as:

- To set up your account and to provide the Services.
- To identify and authenticate your access to the Services.
- To authenticate your identity for the purpose of compliance with regulatory Know Your Customer requirements.
- To send you relevant push notifications, which are based on different activities offered by the Services.
- To communicate with you and to keep you informed of our latest updates and newsletters.
- To market our website, products, and the Services.
- To serve you personalized advertisements when you use the Services.
- To perform research or to conduct analytics in order to improve and customize the Services to your needs and interests.
- To support and troubleshoot the Services and to respond to your queries.
- To investigate and resolve disputes in connection with your use of the Services.
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

## **With Whom We Share the Information and for What Purpose**

We do not rent, sell, or share your Personal Information with third-parties except as described in this Privacy Policy. We may share Personal Information with the following recipients: (i) our



subsidiaries; (ii) affiliated companies; (iii) subcontractors and other third-party service providers; (iv) business partners (such as GEM, Coinify, Simplex and Wyre); (v) auditors or advisers of our business processes; and (vi) any potential purchasers or third party acquirer(s) of all or any portion of our business or assets, or investors in the company.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our recipients for any of the following purposes: (i) storing or processing Personal Information on our behalf (e.g., cloud computing service providers); (ii) processing such information to assist us with our business operations; (iii) carrying out your instructions or giving effect to your preferences in relation to the Services we provide (including if you wish to use services which our business partners provide); (iv) performing research, technical diagnostics, personalization and analytics. We may also disclose Personal Information or any information we may have about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our affiliates, our Users, yourself or any third-party; (vi) for the purpose of collaborating with law enforcement agencies; and (vii) in case we find it necessary in order to enforce intellectual property or other legal rights.

Wherever possible, we will only disclose Personal Information to a third party in circumstances where that third party has agreed to respect the security and confidentiality of Personal Information and treat it in accordance with applicable law. We will seek to ensure that third parties to whom any Personal Information may be disclosed will not use Personal Information for their own purposes and only process Personal Information for specified purposes and otherwise in accordance with our instructions and/or with applicable laws.



We may also disclose Personal Information about you to a third party at your request or direction or with your consent.

### **Corporate Transactions**

We may share information, including Personal Information, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

### **Third-Party Collection of Information**

Our policy only addresses the use and disclosure of information we obtain about you. To the extent that you disclose your information to other parties via the Services (e.g., by clicking on a link to any other website or location) or via other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. You acknowledge that we are not responsible for the products, services, or descriptions of products or services that you receive from third-party sites or to the content or privacy practices of those sites, and that this Privacy Policy does not apply to any such third-party products and services. You are knowingly and voluntarily assuming all risks of using third-party sites to purchase products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

### **Cookies and Google Analytics**

We may use cookies and other technologies or methods of web and mobile analysis to gather, store, and track certain information related with your access to and activity through the Services, including when you visit our website.



Below, we describe the types of cookies (as defined below) we use, and how you can control our use of cookies.

## Types of Cookies We Use

As mentioned above, we will collect certain information about you when you visit our website. We collect such information through the following technologies (collectively, “cookies”):

- **Cookies.** Cookies are small pieces of information that a website assigns to your device while you are viewing a website. Cookies may be served by the entity that operates the website you are visiting (“first-party cookies”) or by other companies (“third-party cookies”). Additionally, some cookies may be temporary and erase when you close your browser (“session cookies”), and others may remain for a set duration (“persistent cookies”).
- **Log Files.** Tools that track actions occurring on the site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- **Web Beacons.** These “tags” and “pixels” are electronic files used to record information about how you browse our website.
- **Social Media Widgets.** These are tools that allow us to provide certain social media features such as links to Facebook, Instagram, and Twitter. These social features are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

Cookies are very helpful and may be used for various different purposes such as delivering personalised services. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the Services quicker, easier and smoother. Our website may use the following types of cookies:

- **Strictly Necessary Cookies.** These cookies are required for the operation of our website, and are essential to enable you to login, navigate around and use the features of a website, or to provide a service requested by you. We do not need to obtain your consent in order to use these cookies.



- **Functionality Cookies.** These cookies allow the website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by using a cookie to store information about the region in which you are currently located, remember changes you have made to text size, fonts, and other parts of web pages that you can customize, and provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect remains anonymous and they cannot track your browsing activity on other websites.
- **Performance/Analytics Cookies.** These cookies allow us to recognize and count the number of visitors and to see how visitors use a website, for example which pages you go to most often, and record difficulties you may experience while using the Website, for example error messages. All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the efficiency of the website. We also use a tool called Google Analytics to collect information about your use of the Services. Google Analytics collects information such as how often users access the Services, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with Personal Information. Google's ability to use and share information collected by Google Analytics about your visits to our website is restricted by the [Google Analytics Terms of Service](#) and the [Google Privacy Policy](#).
- **Targeting/Advertising Cookies.** These cookies are used to deliver advertisements tailored to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organizations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organization. For more information about online behavioral advertising cookies and online privacy, please see the guide produced by the internet advertising industry available at [youronlinechoices.com](http://youronlinechoices.com).

## How to Control Cookies

Your browser is likely set to accept cookies. However, if you would prefer not to receive them, you can alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies (as explained below), it is possible that some areas of our website will not function properly when you view them.

You can control our uses of cookies through your internet browser or through third party tools:

- **Internet Browser.** You can control cookies through most browsers by changing your cookie settings. These settings will typically be found in the “options” or “preferences” menu of your browser.
- **Third Party Tools.** You can also visit <http://www.allaboutcookies.org/> where you will find comprehensive information on cookie management and blocking which pertains to a wide variety of cookies. As noted above, our website uses Google Analytics to collect information about how visitors are using our website. Google Analytics has its own cookies that it uses to track and aggregate this information. You can prevent the use of Google Analytics relating to your use of our website by downloading and installing the browser plugin available [here](#).

## Advertisements and Advertising Tools

### Advertisements

We may use a third-party advertising technology to serve advertisements when you use the Services. This technology uses your information with regards to your use of the Services to serve advertisements to you (e.g., by placing third-party cookies on your web browser). We may also use our third-parties and share with them Users’ information to assist us in evaluating the success of our advertising campaigns and help us retargeting our Users.

### Advertising ID and Advertising Identifier

The Google Advertising ID is an anonymous identifier, provided by Google Play services. If your device has an Advertising ID, we may collect and use it for advertising and user analytics purposes. We may also use Apple’s Advertising Identifier (IDFA), which is a non-permanent device identifier provided by Apple, and any information obtained through the use of the Advertising Identifier, for the purpose of advertising. By downloading or using the Application or the Services you explicitly agree that we may associate your Advertising ID and your Advertising Identifier with your applicable persistent device identifier. This will facilitate our ability to improve your personalized experience. Further, we may use other persistent identifiers for non-advertising



purposes. If your device does not have Advertising ID or Advertising Identifier respectively, we will use other identifiers.

### How to Control Certain Advertising Technology

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (“NAI”) and the Digital Advertising Alliance (“DAA”). For more information about this practice by NAI and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: <https://optout.networkadvertising.org> or <https://optout.aboutads.info> [EU users may opt out of receiving targeted advertising through the [European Interactive Digital Advertising Alliance](#)] You may also control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>.

Additionally, your mobile device operating system may provide mechanisms that allow users to opt out of the use of information about their usage of mobile apps to deliver targeted ads to their mobile device. For more information, or to opt out using these mechanisms, consult your device settings.

### **For How Long We Retain Your Information**

How long we keep your Personal Information will vary depending on the type of Personal Information and our reasons for collecting it. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and our legal obligations (as laws or regulations may set a minimum period for which we have to keep your Personal Information). In general, we will retain your Personal Information for as long as we require it to perform our contractual rights and



obligations, resolve disputes and enforce our policies and agreements, or for periods required by our legal and regulatory obligations.

## **How We Protect Your Information**

We take great care in implementing and maintaining the security of the Services and your information. We will take reasonable steps and use technical, administrative and physical security measures appropriate to the nature of the information and that comply with applicable laws to protect Personal Information against unauthorized access and exfiltration, acquisition, theft, or disclosure. Although we take enhanced steps to safeguard information, given the nature of information security, there is no guarantee that such measures will always be successful. We cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that such access will be prevented. If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly at [info@celsius.network](mailto:info@celsius.network).

## **Minors**

The Services are not designated to individuals under the age of 18. If you are under 18 years old, you should not download the Application, use the Services, or provide any Personal Information to us. We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that an individual under the age of 18 has shared any information, we will delete such information within a reasonable time. If you have any reason to believe that an individual under the age of 18 has shared any information with us, please contact us at [info@celsius.network](mailto:info@celsius.network).

## **EU/UK Based Users and the GDPR**

If you are an EU or UK data subject and the processing of your Personal Information is subject to the GDPR, please review this section in addition to the entire Policy.

## (I) Grounds for Processing

We will only process your Personal Information in circumstances where we have established a lawful basis to do so. Our lawful bases for processing that Personal Information include:

- *Legitimate Interests.* We process Personal Information for our legitimate business interest in managing and promoting our business, provided that our interest is not overridden by your interest. In identifying and relying on this basis for certain processing, we have weighed our legitimate interest as a business against your rights and freedoms and have determined that such processing will not unfairly impact your rights. If you would like further information on how we balanced these interests, you can contact us using the details below. Please note that you have a right to object to the processing of your Personal Information where that processing is carried on for our legitimate interest.
- *Legal Requirements.* We may need to process your Personal Information in order to comply with certain legal and regulatory requirements, including to establish, exercise or defend legal claims, respond to a judicial process, law enforcement or governmental agency.
- *Contract.* Depending on the circumstances, we may need to process your Personal Information for the performance of a contract to which you are a party, or related pre-contractual steps.
- *Consent.* We may process your Personal Information with your consent, as required by the GDPR. You have the right to withdraw this consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

## (II) Your Rights under the GDPR

We respect your privacy rights and therefore you may contact us at any time and request:

- *Access.* You have the right to know we collect certain Personal Information about you and to ask us for copies of your Personal Information. Please use the contact details provided at the end of this Policy.
- *Rectification.* You have the right to request that we correct your Personal Information you think is inaccurate or incomplete.
- *Objection to processing.* You have the right to object to processing in some circumstances, including where we are using your Personal Information for our legitimate interests and for direct marketing purposes, including by opting-out of marketing communications by contacting us using the contact details provided at the end of this Policy.
- *Erasure.* You have the right to request that we erase the Personal Information we have collected about you in certain circumstances. The right to erasure is not absolute, and only applies if we no longer need your Personal Information to carry out the purpose that we collected it for, whilst in compliance with laws applicable to us; you have withdrawn your consent to our use of your Personal Information; you have objected to our use of your Personal Information and your interests outweigh our interests in using it; you believe we have processed your Personal Information unlawfully; or we have a legal obligation to erase your data. Subject to our retention policies, we will consider any request to erase Personal Information for any of the above reasons and endeavour to comply with the request to the extent permitted by law, but we may not always be able to comply with your request. We may be required to retain the Personal Information for certain retention periods in order to comply with legal and regulatory requirements under applicable laws and regulations to which we are subject. If we are unable to comply with your request, we will contact you in writing. If you wish to exercise this right, please contact us at: [app@celsius.network](mailto:app@celsius.network).

- *Restrict processing.* You have the right to ask us to restrict the processing of your Personal Information in certain circumstances, including if you have concerns regarding the accuracy of your Personal Information, where you have made an objection to our use of your personal data; or if you believe we processed your Personal Information unlawfully, but you do not want us to delete it.
- *Data portability.* You have the right to receive a copy of the Personal Information that we collect about you in a way that is accessible and in a machine-readable format where the processing is based on your consent, the performance of a contract with you, or carried out by automated means. You have the right to request that such Personal Information be transmitted directly from us to another data controller, where technically feasible.
- *Withdrawal of consent.* You can withdraw your consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

We will store your Personal Information only for as long as necessary for the purposes for which it was collected, including to provide the Services and to comply with our legal obligations, resolve disputes and enforce our policies and agreements. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client Personal Information, account opening documents, communications and anything else as required by applicable laws and regulations.



We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion. If you wish to make a complaint regarding our handling of your Personal Information, you can contact us at [info@celsius.network](mailto:info@celsius.network). You may also make a complaint to the relevant supervisory authority for data protection issues. In the UK this is the Information Commissioner's Office ("ICO"). Contact details for the ICO may be found at [www.ico.org.uk](http://www.ico.org.uk).

### (III) Transfer of Information Outside the UK and/or the EEA

Please note that some data recipients may be located outside the EEA and/or the UK. In such cases we will seek to ensure a similar degree of protection is afforded to it by ensuring that, where possible, Personal Information is generally transferred only to persons in countries outside the EU or the UK in one of the following circumstances:

- transfers only to such countries as approved by the European Commission or the equivalent entity in the UK as providing adequate level of data protection;
- to persons and undertakings to whom the transfer of such Personal Information is made pursuant to a contract that is compliant with the model contracts for the transfer of Personal Information to third countries from time to time approved by the European Commission (as supplemented where and if required) or the equivalent body in the UK;
- to persons and undertakings outside of the EU or the UK pursuant to other appropriate safeguards for the transfer of Personal Information; and
- only on one of the conditions allowed under the GDPR in the absence of (i) a decision by the European Commission or the equivalent entity in the UK that has deemed a country to provide an adequate level of protection for Personal Information (i.e. an adequacy decision) or (ii) appropriate safeguards such as a contract that is compliant with the model contracts for the transfer of Personal Information to third countries approved by the European Commission or the equivalent entity in the UK.

You can contact us through the information provided below for further information on specific mechanisms we utilise for transferring Personal Information outside the EU or the UK and the countries to which such transfer may be made.



## **Additional Information for California Residents**

The CCPA imposes certain obligations on us and grants certain rights to California residents (“California Resident,” “you” or “your”) with regard to “personal information” as defined by the CCPA. If you are a California Resident, please review the following information about our privacy practices surrounding how and why we collect, use, disclose, and share your personal information and your potential rights with regard to your personal information under the CCPA. The rights described in this section are subject to exemptions and other limitations under applicable law.

Terms used in this section have the meaning ascribed to them in the CCPA. We are a “business.” “Personal information” as used in this section has the same meaning as in the CCPA. It does not include deidentified information, aggregate consumer information or publicly available information, as those terms are defined in the CCPA.

### **Notice at Collection and Use of Personal Information**

#### *What Type of Information We Collect*

Depending on how you interact with us, we may collect the categories of personal information listed above in the section “**What Type of Information We Collect**” above.

#### *How We Use Collected Information*

We may use your personal information for the business or commercial purpose listed above in the section “**How We Use The Information**” and “**With Whom We Share The Information and For What Purpose**” above.



## **Our Collection, Use, Disclosure, and Sharing of Personal Information**

### *What Information We Have Collected and the Sources from Which We Collected It*

In the preceding 12 months, and depending on how you interact with us, we may have collected all or some of the personal information listed above in **“What Type of Information We Collect”** above. We may have collected personal information from all or some of the categories of sources listed in the above section, **“Sources of Personal Information”**

### *Purposes for Collecting Personal Information*

We may collect the personal information for one or more of the following business or commercial purposes described in the above section, **“How We Use The Information”** and **“With Whom We Share The Information and For What Purpose”** above.

### *Our Disclosure, Sharing of Personal Information*

We do not sell your personal information. We do not knowingly sell the personal information of California residents under 16 years old. We may disclose your personal information to certain third parties for a business purpose. In the preceding 12 months, we may have disclosed for a business purpose the following categories of personal information to the following categories of third parties:

**Category of Personal Information**

**Category of Third Party Information Disclosed to for a Business Purpose**

Identifiers and Similar Information  
(such as name, email or IP  
address)

- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation
- Providers or partners that support our business operations (such as banking partners; wallet providers; etc)
- Affiliates
- Marketing partners
- Providers or partners that support our business operations (such as payment services providers, etc.)

Additional Information Protected  
by Certain Federal or State Laws  
(for example, financial information)

- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation

Characteristics Information (such as age or gender)

- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation

Commercial Information (for example, products purchased)

- Affiliates
- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation

Internet and Electronic Network Activity Information (such as browsing history and your interactions with our website)

- Analytics providers



Geolocation Information (such as device location)

- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation

Audio, electronic, or visual information (for example, recordings of audio or video calls, conversations or communications)

- Providers or partners that support our business operations (such as telephone system providers and messaging systems)
- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation

Inferences drawn from other information to create a profile reflecting a client's preferences or characteristics.

- Entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money laundering or anti-terrorism checks
- Judicial courts, regulators, or other government agents purporting to have jurisdiction over the group or opposing counsel and parties to litigation

We may share your personal information with our service providers, other entities that have agreed to limitations on the use of your personal information, or entities that fit within other exemptions or exceptions in or as otherwise permitted by the CCPA.

### California Resident's Rights Under the CCPA

If your personal information is subject to the CCPA, you may have certain rights with regard to such personal information, including the right to:

- **Notice at Collection.** Be informed, at or before the point of collection, of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used.
- **Request to Delete.** Request that we delete any personal information about you that we have collected or maintained, subject to certain exceptions. For example, we may be



required to retain the personal information for certain retention periods in order to comply with legal and regulatory requirements under applicable laws and regulations to which we are subject. If you wish to exercise this right, please contact us at: [app@celsius.network](mailto:app@celsius.network).

- **Request to Know.** Request that we provide you with: (i) the categories of personal information we have collected about you; (ii) the categories of sources from which we collected the personal information; (iii) the business or commercial purpose for collecting or selling the personal information; (iv) the categories of third parties with whom we share personal information; (v) the specific pieces of personal information we have collected about you; and (vi) the categories of personal information about you we have disclosed for a business purpose.
- **Not to Be Discriminated Against.** Not be discriminated against because you exercised any of your rights under the CCPA.
- **Opt-Out of Sale.** Request that we not sell your personal information if a business sells your personal information (we do not).

The CCPA does not restrict our ability to do certain things like comply with other laws or comply with regulatory investigations. We also reserve the right to retain, and not to delete, certain personal information after receipt of a Request to Delete from you where permitted or required by the CCPA or another law or regulation.

## How to Submit a CCPA Rights Request

You can submit a Request to Know or Request to Delete, as described above, by calling 800-654-9386, through our website [www.celsius.network](http://www.celsius.network), or via email to [info@celsius.network](mailto:info@celsius.network). When you submit a Request to Know, Request to Delete, or Request to Opt-Out, we may ask that you provide clarifying or identifying information to verify your request. Such information may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, your name, email address and a copy of government issued identification. Any information gathered as part of the verification for a Request to Know, Request to Delete, or Request to Opt-Out will be used for verification or opt-out purposes only.

If you would like to use an authorized agent to submit a Request to Know or a Request to Delete, we may request proof that they are authorized to act on your behalf, or have a power of attorney.



We may also require that you directly verify your own identity with us and directly confirm with us that you provided the authorized agent permission to submit the request.

We will deliver responses to verifiable consumer requests, free of charge by mail or electronically, at your election.

We will try to respond to your Requests to Know or to Delete within forty-five (45) days of receipt of the request. If we require more time, we will try to inform you of our need for an extension. Even with an extension, we will try to provide a response within ninety (90) days of initial receipt of the request.

Keep in mind that we are not required to provide information in response to Requests to Know more than twice in a 12-month period. Any response to a Request to Know will only cover the 12-month period preceding the verifiable request.

### **Additional California Privacy Rights**

You have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. Please note, however, that we do not currently disclose any of your personal information to third parties for their direct marketing purposes.

Some web browsers have a “Do Not Track” feature. This feature lets you tell websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. Our website is not currently set up to respond to those signals.

### **Updates or Amendments To The Privacy Policy**



We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on our website or Application (as reflected in the “Last Revised” heading). In the event of a material change to the Privacy Policy, we will notify you through the Services or via email, or you may be notified within the Application. We encourage you to review this Privacy Policy regularly for any changes. Your continued use of the Services, following the notification of such amendments, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

### **How To Contact Us**

If you have any general questions regarding the Services or the information that we collect about you and how we use it, please contact us at [info@celsius.network](mailto:info@celsius.network).

**Last Revised: September, 2022**