

PRIVACY POLICY

This Privacy Policy explains how FTLB platform located at FTLB.io (“**Platform**”), and its related services, tools, and features (collectively, “**Services**”), operated by or on behalf of FTLB inc (inclusive with its affiliates, “**Company**”, “**we**” or “**us**”), collects, uses, shares, discloses, and otherwise processes personal Data (as defined below) from users (“**User**”, or “**you**”), and outlines your rights with respect to such Data.

When you use the Services or otherwise interact with us, such as by accessing the Platform, connecting a Wallet (as defined below), or communicating with us via email, you may provide or we may collect certain information about you. This Privacy Policy describes the types of Data we collect, how we use it, and the measures we take to protect it.

This Privacy Policy forms an integral part of the Company’s Terms of Use located at FTLB.io/terms.pdf, and should be read together with them. By accepting the Terms of Use or by accessing or using any part of the Services, you agree to the terms of this Privacy Policy, including any amendments or updates. If you do not agree to this Privacy Policy, you must not use or access the Services.

Unless otherwise defined herein, capitalized terms shall have the meanings assigned to them in the Company’s Terms of Use. In the event of a conflict between this Privacy Policy and the Terms of Use, this Privacy Policy shall prevail, but solely with respect to matters concerning the processing of your Data.

For the purposes of this Privacy Policy, “**Data**” means any information that relates to, describes, identifies, or could reasonably be linked to you, whether directly or indirectly. This may include, without limitation, your connected Wallet (as described in Terms of Use), Internet Protocol address (“**IP**”), device information, and other identifiers as further described herein.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING THE PLATFORM OR ANY SERVICES, YOU CONSENT TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR DATA AS DESCRIBED BELOW. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE OR ACCESS ANY OF THE SERVICES.

1. CHANGES TO THE PRIVACY POLICY

- 1.1. We reserve the right at any time to: modify, update, or change the terms and conditions of our Privacy Policy. In each case we will update the “Last Updated” date at the top of this Privacy Policy. If we make changes that are material, we will use reasonable efforts to attempt to notify you, such as by e-mail and/or by placing a prominent notice on the first page of the Platform.
- 1.2. However, it is your sole responsibility to review this Privacy Policy from time to time to view any such changes. The updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the updated Privacy Policy. Your continued access or use of the Services after the modifications have become effective will be deemed your acceptance of the modified Privacy Policy.

- 1.3. PLEASE CHECK BACK PERIODICALLY FOR THE LATEST VERSION OF THE PRIVACY POLICY.
- 1.4. IF YOU DO NOT AGREE TO ANY UPDATES TO THIS PRIVACY POLICY PLEASE DO NOT ACCESS OR CONTINUE TO USE THE SERVICES.

2. DATA YOU PROVIDE TO US

- 2.1. When you use or access the Services, send a message to us, or participate in activities on the Services, you may input your Data into the Services.
- 2.2. We collect the following Data that you voluntarily provide to us:
 - 2.2.1. Your blockchain wallet address, which is necessary to access specific features of the Services (“**Wallet**”). While we do not consider a wallet address alone to be personally identifiable, it may become associated with you through other Data you provide or through behavioral Data generated via your interaction with the Platform;
 - 2.2.2. Additional information you may voluntarily enter, upload, submit, or communicate to us via the Services or use of the Platform, including but not limited to your full name, residential address, IP address, email address, phone number, and age.

3. PUBLIC DATA OBSERVED FROM BLOCKCHAINS

- 3.1. We collect and process information that is publicly and transparently available on supported blockchains. This may include Wallet address, token holdings, transaction history, such as purchases, sales, or transfers, and other on-chain activity.
- 3.2. Such Data is by its nature publicly accessible and is not collected from any private or confidential sources. We may associate this Data with other information you voluntarily provide to us solely to deliver core functionalities of the Services, detect suspicious activity, ensure compliance, and enhance User experience.
- 3.3. Please note that we do not deanonymize blockchain Data or combine it with off-chain information without your explicit interaction or consent.

4. DATA COLLECTED AUTOMATICALLY

- 4.1. Certain Data is collected automatically when you use or visit our Services. This Data does not reveal your identity, such as your name or contact information, but may include information about your device, its use, and other technical information. This Data helps us maintain security, ensure optimization of the Service for your needs, and facilitate User support.
- 4.2. The tracking technologies we use to collect this Data include cookies, web beacons, flash cookies, embedded scripts, location-identifying technologies, pixels, and other similar technologies.
- 4.3. The tracking technologies automatically collect the following categories of Data:

- 4.3.1. **Browser Data:** information that your browser automatically sends when you use the Services, including IP address, browser type, browser language, settings, Wallet address, Wallet type, and Services usage patterns. You have the option to configure your browser settings to reject all cookies or to notify you when a cookie is being sent. However, please note that if you decline cookies, certain parts of our Services may not be accessible to you;
 - 4.3.2. **Device Data:** information about the device you use, such as device type, model and manufacturer, device operating system brand and model, device hard disk drive, operating system version, and information regarding the location of your device;
 - 4.3.3. **Location tracking:** We collect Data that pinpoints your location using GPS, Wi-Fi, or cell-site triangulation. This helps us prevent fraud and manage risks effectively;
 - 4.3.4. **Usage Data:** information about your use of the Services, including patterns, time, and date of your use of the Services;
 - 4.3.5. **Analytics Data:** general information about traffic and usage trends for the Services.
- 4.4. WE DO NOT ATTEMPT TO ASSOCIATE THIS TECHNICAL DATA WITH YOUR PERSONAL IDENTITY UNLESS REQUIRED FOR SAFETY, LEGAL COMPLIANCE, OR FRAUD PREVENTION.

5. DATA COLLECTED FROM THIRD-PARTIES

- 5.1. We may obtain Data about you or your Wallet address from external sources, including service providers, other Users, third-party integrations, publicly available sources, such as blockchain explorers, and public social media platforms (collectively, “**Third-Parties**”). This may include, without limitation, your Wallet address, transaction history, and any other information you have publicly disclosed or made accessible to such Third-Parties through interactions, integrations, or connections you have authorized.
- 5.2. We only use such Data in accordance with this Privacy Policy and for purposes consistent with your interaction with the Platform, such as improving User experience, preventing fraud, ensuring compliance with applicable laws, and enhancing network transparency.
- 5.3. PLEASE NOTE THAT ANY INFORMATION YOU VOLUNTARILY PROVIDE TO THIRD-PARTY SERVICES IS GOVERNED BY THEIR OWN PRIVACY POLICIES AND DATA HANDLING PRACTICES. WE DISCLAIM ANY RESPONSIBILITY OR LIABILITY FOR HOW SUCH THIRD-PARTIES COLLECT, PROCESS, USE, OR DISCLOSE YOUR DATA. WHERE APPLICABLE, WE STRONGLY ENCOURAGE YOU TO REVIEW THE PRIVACY POLICIES AND TERMS OF THOSE PLATFORMS BEFORE ENGAGING WITH THEM OR SHARING ANY DATA.

6. THIRD-PARTY WALLET EXTENSIONS

- 6.1. To access and interact with the Services, you may be required to connect a Wallet. These Wallets are operated independently by Third-Parties, and the Company neither controls nor stores any credentials or private keys associated with them. Your interactions with such Wallets are governed solely by their respective privacy policies.
- 6.2. While we do not collect sensitive Wallet Data, certain actions you take, such as staking, claiming rewards, or interacting with NFTs, may involve transactions between your Wallet and smart contracts operated by the Platform. In such cases, Data processed via these interactions may fall under this Privacy Policy.
- 6.3. YOU ARE SOLELY RESPONSIBLE FOR SAFEGUARDING YOUR WALLET AND ENSURING ITS SECURE USE.

7. SOCIAL NETWORKS AND OTHER THIRD-PARTY WEBSITES AND LINKS

- 7.1. We may provide links to websites or other online platforms operated by Third-Parties, including Third-Party social networking platforms, such as X (formerly Twitter), Discord, Telegram or Medium as well as decentralized finance applications, operated by Third-Parties (collectively, “**Social Networks**”). If you follow links to these Social Networks, you should review their privacy and security policies and other terms and conditions.
- 7.2. WE DO NOT GUARANTEE AND ARE NOT RESPONSIBLE FOR THE PRIVACY OR SECURITY OF THESE SOCIAL NETWORKS, INCLUDING THE ACCURACY, COMPLETENESS, OR RELIABILITY OF INFORMATION FOUND ON THESE SOCIAL NETWORKS.
- 7.3. Data you provide on public or semi-public venues, including information you share or post on Social Networks, may also be accessible or viewable by other Users of the Services and/or users of those Social Networks without limitation as to its use by us or by Third-Parties.
- 7.4. OUR INCLUSION OF SUCH LINKS DOES NOT, BY ITSELF, IMPLY ANY ENDORSEMENT OF THE CONTENT ON SUCH SOCIAL NETWORKS OR OF THEIR OWNERS OR OPERATORS, EXCEPT AS DISCLOSED ON THE SERVICES.

8. PURPOSES FOR WHICH WE USE YOUR DATA

- 8.1. We use your Data collected through our Service to:
 - 8.1.1. Operate, maintain, and provide you with access to the Services;
 - 8.1.2. Process transactions;
 - 8.1.3. Analyze usage patterns, improve and personalize your experience, and enhance the performance of the Services;
 - 8.1.4. Communicate with you, send you emails, including confirmations and reminders, respond to your requests for assistance, provide support, investigate bugs or report on technical issues;

- 8.1.5. Comply with applicable laws, cooperate with investigations by law enforcement or other authorities of suspected violations of law, and/or to protect our legal rights;
- 8.1.6. Notify you about changes to the Services and to send you promotional communications, advertisements, newsletters, and updates about features, offers, and content that may be of interest to you. BY USING OUR SERVICES, YOU CONSENT TO RECEIVE SUCH COMMUNICATIONS. YOU MAY OPT OUT OF RECEIVING PROMOTIONAL EMAILS AT ANY TIME BY FOLLOWING THE UNSUBSCRIBE LINK INCLUDED IN EACH MESSAGE OR BY CONTACTING US DIRECTLY; or
- 8.1.7. Maintain safety and security, detect, prevent, and respond to potential or actual security incidents, and protect against other illegal activities.

9. HOW WE DISCLOSE YOUR DATA

- 9.1. In certain circumstances, the Company may share your Data with Third-Parties for legitimate purposes subject to this Privacy Policy. Such circumstances comprise the following:
 - 9.1.1. Compliance with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries;
 - 9.1.2. In connection with an asset sale, merger, bankruptcy, or other business transaction;
 - 9.1.3. To enforce any applicable Terms of Use;
 - 9.1.4. To ensure the safety and security of the Company and/or its Users;
 - 9.1.5. In connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets;
 - 9.1.6. In the event of an insolvency, bankruptcy, or receivership, Data may be transferred as a business asset;
 - 9.1.7. If another company acquires our Company, business, or assets, that company will possess the Data collected by us and will assume the rights and obligations regarding your Data as described in this Privacy Policy;
 - 9.1.8. We may display or share Data relating to your public activity on blockchains. For example, we may use APIs that make certain Data, including your blockchain activity, available to websites, apps, and others;
 - 9.1.9. Data sharing with blockchain analysis service providers;
 - 9.1.10. Data sharing with Data analytics vendors;

9.1.11. Data sharing with any parent companies, subsidiaries, joint ventures, or other companies under common control with us, in which case we will require such entities to honor this Privacy Policy;

9.1.12. Data sharing with professional advisors, auditors, law firms, or accounting firms.

10. COOKIES AND OTHER TRACKING TECHNOLOGIES

10.1. Your browser settings may allow you to transmit a “Do Not Track” signal when you visit various websites. Like many websites, our Platform is not designed to respond to “Do Not Track” signals received from browsers.

10.2. Most web browsers are set to accept cookies by default. However, you may have the ability to configure your browser settings to manage cookies, web beacons, clear GIFs, geolocation tools, and other tracking technologies. You can typically choose to block, disable, or delete cookies at any time through your browser settings.

10.3. Please note that if you choose to block or delete cookies, some parts of the Services, including core features or user portal functionality, may not function properly or may become inaccessible.

10.4. If you have any questions about the types of cookies and tracking technologies we use, the specific Data they collect, or your options for managing such technologies, please contact us using the information listed below.

11. YOUR RIGHTS TO DATA

11.1. You have the following rights to your Data:

11.1.1. The right to know what Data we have about you;

11.1.2. The right to correct, delete, or update your Data. You can access and modify your Data through your account or the settings section of the Service. Please note that in certain circumstances, we may be legally obligated to retain specific Data for a defined period and may not be able to modify or delete it until that period has expired;

11.1.3. The right to opt out of receiving electronic marketing communications from us. We may periodically send you emails and messages promoting the use of the Services. You can opt-out (unsubscribe) of receiving these messages by following the unsubscribe link included in each message or by contacting us directly.

11.2. If you wish to exercise any of these rights, or if you believe we have violated your Data rights, please contact us at contact@ftlb.io. We value your privacy and are committed to resolving any concerns promptly and fairly.

12. DATA RETENTION

- 12.1. We retain your Data for as long as it is necessary to provide you with access to the Services and fulfill the purposes described in this Privacy Policy. This includes, but is not limited to, maintaining the security and integrity of the Services, providing User support, and complying with legal obligations.
- 12.2. Even after you stop using the Services, we may retain certain Data if required for legal compliance, dispute resolution, fraud prevention, enforcement of our Terms of Use or agreements, or to protect our legitimate interests.
- 12.3. Once your Data is no longer required for these purposes, we will securely delete or anonymize it, unless technical or regulatory constraints prevent us from doing so.

13. DATA SECURITY

- 13.1. We use appropriate technical and organizational measures to prevent accidental or intentional manipulation, partial or total loss, destruction or unauthorized access to your Data by Third-Parties. Our security measures are continuously improved in line with technological developments. Furthermore, all service providers commissioned by us are obliged by means of appropriate contractual agreements to take appropriate measures in accordance with the current state of the art to prevent the aforementioned risks.
- 13.2. Please be aware that, despite our reasonable efforts to protect your Data, no security measures are perfect or impenetrable, and we cannot guarantee “perfect security.” Please further note that any Data you send to us electronically, while using the Services or otherwise interacting with us, may not be secure while in transit. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. You are responsible for the security of your Wallet, and we urge you to take steps to ensure it remains secure.
- 13.3. In the event that any Data under our custody and control is compromised as a result of a breach of security, we will take steps to investigate and remediate the situation and, in accordance with applicable laws and regulations, notify those individuals whose Data may have been compromised. In the event of a Data breach involving our systems, we will promptly investigate, take appropriate remedial action, and notify affected Users as required by applicable law.
- 13.4. NOTWITHSTANDING ANY PROVISION TO THE CONTRARY, AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, THE COMPANY DISCLAIMS ANY AND ALL LIABILITY FOR DIRECT, INDIRECT, INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM OR RELATING TO ANY BREACH OF THIS PRIVACY POLICY, EXCEPT WHERE SUCH DAMAGES ARE THE RESULT OF THE COMPANY’S GROSS NEGLIGENCE OR WILLFUL MISCONDUCT.
- 13.5. IN ANY EVENT, THE COMPANY’S TOTAL AGGREGATE LIABILITY TO YOU FOR ALL CLAIMS ARISING OUT OF OR IN CONNECTION WITH THIS PRIVACY POLICY SHALL NOT EXCEED ONE HUNDRED U.S. DOLLARS (USD \$100.00).

14. CHILDREN’S PRIVACY

- 14.1. The Services are not intended for, and may not be used by, individuals under the age of 18 or the age of majority in their jurisdiction, whichever is higher. By using the Services, you confirm that you meet this requirement.
- 14.2. We do not knowingly collect or solicit Data from individuals under the age of 18 (or the applicable age of majority). If we become aware that we have inadvertently collected such Data, we will take commercially reasonable steps to delete it from our systems as soon as practicable. If you are a parent or legal guardian and believe that your child under the age of 18 has provided us with Data, please contact us at contact@ftlb.io, and we will promptly review and address your request for deletion.

15. HOW TO CONTACT US

- 15.1. If you have any questions about this Privacy Policy, your privacy, or how we protect the Data we hold about you, you can contact us at contact@ftlb.io.