

PRIVACY POLICY

Effective as of February 2, 2023

At Earn DLT, Inc. we respect the privacy of our customers, visitors, users, and others (collectively “Users” or individually a “User”). This Privacy Policy (“Privacy Policy”) describes our privacy practices and applies to our websites, platform, mobile application, and all other services (collectively, “Services”) we offer to Users. Please read this Privacy Policy carefully to learn how we collect, use, share and otherwise process personally identifiable information and information that can reasonably be used to contact or distinguish a person (collectively “Personal Data”), and your rights and choices regarding our processing of your Personal Data.

A reference to “we,” “us,” “our,” “Earn” or the “Company” is a reference to Earn DLT, Inc., a Delaware corporation. A reference to “you” or “your” means the User, an individual, or if applicable, the company or legal entity you represent.

i. Activities Covered

This Privacy Policy applies to the following activities:

- Visiting our websites that display or link to this Privacy Policy;
- Using our platform, including, without limit, using the Platform to access or review transaction materials and information related to digital, nonfungible representations of real-world assets in the form of “Tokens”;
- Creating, changing or using a User account (“Account”);
- Browsing or interacting with our websites or services via the internet;
- Use of social media platforms and applications, or demographics derived from the profiles Users create;
- Transactions entered into on our platform, including primary offerings of securities from issuers (“Issuers”) or trades of securities or other assets represented by Tokens with other Users;
- Interacting with our personnel, whether in person, on the telephone, via email or any other form of communication;
- Interacting with and submitting inquiries to third parties with whom we have a relationship; and
- Receiving communications from us, including emails, texts, fax, push or in-application notifications.

In particular, this Privacy Policy sets forth Earn’s policy with respect to its processing of two types of

data:

- With respect to Personal Data that Users ask us to process on their behalf (“Processor Data”), which will include any Personal Data that Users provide to us with the expectation that such Personal Data will be transferred to an Issuer in connection with an offering of securities, or otherwise transferred or shared as described herein, Earn is the “processor” of the data under applicable law, and the Issuer or other transferee is the “controller”. Any Processor Data collected is done so based on Earn’s reliance upon representations made by the Issuer as to their lawful right to collect the applicable Personal Data.
- Data, including Personal Data, that we process for our own business, other than for our human resources and recruiting operations, is referred to under applicable law as “Controller Data”. This includes, for example, the information we collect through any of our websites and the names and contact information of our Users and vendors. Under applicable law, Earn is deemed to be the “controller” of such data.

2. Responsible Entity

When webpages or applications are provided by us and links to this Privacy Policy, this Privacy Policy applies. Our websites may contain links to other websites, applications and services maintained by third parties. When visiting such websites, applications or services, this Privacy Policy does not apply. The information practices of such other websites, applications or services are governed by the third-party privacy policies, which we encourage you to review to better understand those third parties’ privacy practices.

3. What Personal Data Do We Collect?

3.1 Personal Data we collect directly from you may include the following:

- a) Contact Information: This includes, but is not limited to, your name, email, address, and telephone number(s).
- b) Account Information: This includes your account identification number, username, password, and answers to your recovery/security questions.
- c) Billing Information: To the extent necessary for you to purchase products or services from us or a third party who offers products or services in connection with our Services, such as verification of your status as an accredited investor, we will collect your credit card information, including your billing zip code, and/or other payment information.
- d) Government-issued Identification Information: To the extent permitted under applicable law, we will collect such items as a national identification numbers (e.g., a social security number, tax identification number, or passport number), state or local identification numbers (e.g., a driver’s license or other government-issued identification number), and a

copy of your government-issued identification card.

- e) Demographic Information: This includes, but is not limited to, your date of birth, your country of citizenship, and/or your country of residence.
- f) Investment Profile: This includes, without limit, your investment objectives, investment experience, liquidity needs, and risk tolerance.
- g) Information Related to Accredited Investors Status: This includes your stated net worth; stated current, historical, and expected future income; source(s) of income; and supporting documentation that you choose to submit (e.g., tax forms, tax returns, pay stubs, financial account statements, and information about your financial assets and liabilities). This can also include information about a User's spouse.
- h) Employment/Ownership Information: In situations where you create an Account on behalf of an entity, this can include your job title and whether you are a beneficial owner or authorized signatory of the legal entity using the Services.
- i) Transaction Information: This includes details about financial transactions, trades or investments you make using the Services, including contracts you may execute (by using your traditional, electronic or any other binding signature or form of assent), that may be recorded onto Earn's proprietary permissioned blockchain and distributed ledger technology as part of our platform.
- j) Issuer Information: This includes, generally and without limit, Personal Data of the beneficial owners, directors, officers and authorized signatories of Issuers raising funds or investing through the Services.
- k) Property Information: We collect information about any properties that will be the subject of securities offerings on our platform.
- l) Advisor Information: This includes Personal Data about our Users' professional or financial advisors, such as the name and contact information about our Users' lawyer, accountant, broker, or registered investment advisor, for purposes of verifying a User's status as an accredited investor.
- m) Technical Data: if you use and interact with our websites, we automatically collect log files and other information about your device, browser and your usage of our websites through cookies, web beacons or similar technologies, such as IP-addresses, media access control (MAC) addresses or other identifiers, which may qualify as Personal Data (view the "What device and usage data we process" section below).
- n) Feedback and correspondence: This includes information you provide when you request information from us, receive customer support, or otherwise correspond with us, including

by interacting with our pages on social networking sites or services. This includes your preferences for receiving marketing communications and details about how you engage with our marketing communications

- o) Financial account information: such as your bank account details and digital wallet address.
- p) Other Information: We may retain a record of any other information you provide us while using our Services.

3.2 Information we receive as a result of our verification processes:

We may receive information about you from our vendors, who we refer to as “Earn Vendors”. For example, we use Earn Vendors to verify the identity and accredited investor status of Users of our Services and perform Know Your Customer (“KYC”) and Anti-Money Laundering (“AML”) checks. In addition, we may, but undertake no obligation to, request that our Earn Vendors provide us with information on the sponsors, officers and directors of Issuers applying to be listed in our platform. The Earn Vendors may provide us with information such as:

- 1. Whether you are an accredited investor, as defined in Rule 506 of Regulation D promulgated under the Securities Act of 1933, as amended.
- 2. Whether the Personal Data that you provided to us matches information contained in databases they consult.
- 3. Whether you or your company are on government lists of restricted persons (e.g., the OFAC list or other watch lists or sanctions lists).
- 4. Whether there are adverse media reports regarding you or your company.
- 5. Whether you or your company qualifies as a “politically exposed person” (e.g., a government official or representative of an international organization) under applicable law.

The information we collect from vendors may include sensitive information (e.g., criminal conviction for fraud) to the extent permitted under applicable law.

3.3 Third Party Analytics Providers.

We use, and in the future intend to use, third-party analytics services similar to and including, without limitation, Google Analytics provided by Google Inc. (“Google”).

These Third-Party Analytics Providers use cookies and similar technologies to analyze how individuals use our services, market to past and prospective visitors, and compile statistical reports. Such services may also collect or derive information about visitors’ use of other websites.

As a User, you acknowledge that you accept and consent to our privacy practices as well as

those practices indicated in the privacy policies of Google Analytics, Facebook and any other Third-Party Analytics Providers we use as linked below.

Google Analytics includes the Demographics and Interest Reporting features to collect and report our website traffic data. It also includes Google Display Network Impression and Double Click Campaign Manager Integration. You can opt-out of Google Analytics by using the link <https://tools.google.com/dlpage/gaoptout>. You can opt out of receiving targeted advertising at www.aboutads.info.

The following is a list of Third-Party Analytics Providers with whom we currently partner to place advertisements across the internet.

<u>Name of Third-Party Provider</u>	<u>Link to Partner's Privacy Policy</u>
Google Adwords, Ads Manager, and Workspace	https://policies.google.com/privacy?hl=en
Amazon Web Services	https://aws.amazon.com/privacy/
HubSpot	https://legal.hubspot.com/privacy-policy

3.4 Remarketing.

The Company's website uses the Third-Party Analytics Providers to advertise on third party websites to previous visitors to our site. This could mean that we advertise to previous visitors who have not completed a task on our site, for example using the contact form to make an inquiry, registering an Account or initiating an investment or trade even if such task is not completed. Such remarketing could be in the form of an advertisement on the Google search results page, a site in the Google Display Network or site in another network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to our website. Data collected from our Services will be used in accordance with our Privacy Policy and the privacy policy of the applicable third-party vendor.

3.5 Third Party Vendors.

To assist us in meeting business operations needs and to perform certain services and functions your Personal Data may be shared with third-party providers of payment, hosting, shipping, customer relations management software developers, website development, creative development, technical support, network and security, e-mail communication and customer support services.

We use Amazon Web Services for infrastructure, databases, DNS, etc. Their privacy policy can be found [here](#).

We use SendGrid for email communications. Their privacy policy can be found [here](#).

We use Hubspot for certain aspects of our marketing, sales and customer service. Their privacy policy can be found [here](#).

We use DocuSign for electronic signature collection. Their privacy policy can be found [here](#).

We use Stripe for payment processing. Their privacy policy can be found [here](#).

We use Atlassian and its tools, namely Confluence and Bitbucket, for project and service management. Their privacy policy can be found [here](#).

We use Postman for development and quality assurance. Their privacy policy can be found [here](#).

In addition, Earn Vendors will share information with us. For example, when you establish a digital wallet through an Earn Vendor, the wallet's address will be shared with us.

For more details on the third parties that may place cookies through the Site, please see the "Cookies" section below. Following our instructions, these parties may access, process or store Personal Data in the course of performing their duties for us.

4. Device and Usage Data We Process.

We use common information-gathering tools, such as log files, cookies, web beacons and similar technologies to automatically collect information, which may contain Personal Data, from your computer or mobile device as you navigate our website or interact with emails and other messages, we send you.

4.1 Non-Personally Identifying Information and Log Files.

Like many websites, we gather certain other non-personally-identifying information ("Non-PII") automatically via log files. This collected Non-PII may include your Internet Protocol (IP) address (or proxy server), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. This Non-PII is used to analyze overall trends, to help us provide and improve our websites and to guarantee their security and continued proper functioning. We may also collect IP addresses and MAC addresses from Users when they log into the services as part of the Company's security features.

4.2 Cookies, web beacons and other tracking technologies.

We use cookies and similar technologies such as web beacons, tags and Javascript alone or in conjunction with cookies to compile information about usage of our websites and interaction with emails from us.

When you visit our websites, our servers or an authorized third party may place a cookie on your browser, which can collect information, including Personal Data, about your online activities over time and across different sites. Cookies allow us to track overall usage, determine areas that you prefer, make your usage easier by recognizing you and providing you with a customized experience.

We may use both session-based and persistent cookies. Session cookies exist only during one session and disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our websites or services. To opt-out of tracking by Third Party Analytics Providers, please use the specific opt-out mechanism as indicated further below.

We may also use web beacons on our websites and other electronic marketing. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to one of our websites. Such tracking technologies are used to operate and improve our websites and digital communications and track the clicking of links or opening of messages.

The Third-Party Analytics Providers in the table in Section 3.3 are the third-party vendors with whom we currently partner to place advertisements across the internet. Others may be added at any time.

As described above, we or third parties may place or recognize a web beacon or unique cookie on your browser when you visit our websites for the purposes of serving you targeted advertising (also referred to as “online behavioral advertising” or “interest-based advertising”). To learn more about targeted advertising, advertising networks and your ability to opt out of collection by certain third parties, please visit the opt-out pages of the Network Advertising Initiative, [here](#), and the Digital Advertising Alliance, [here](#).

To manage the use of targeting or advertising cookies on our websites, consult your individual browser settings for cookies. To learn how to manage privacy and storage settings for Flash cookies [click here](#). Various browsers may offer their own management tools for removing HTML5 local storage.

4.3 Opt-Out from the collection of device and usage data.

You may opt-out from the collection of device and usage data (see “What Device and Usage Data We Process” section above) by managing your cookies at the individual browser level. In addition, if you wish to opt-out of interest-based advertising [click here](#), or if located in the European Union [click here](#)). Please note, however, that by blocking or deleting cookies and similar technologies used on our websites, you may not be able to take full advantage of our websites.

While some internet browsers offer a “do not track” or “DNT” option that lets you tell

websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard that has been adopted by industry groups, technology companies or regulators. Therefore, we do not currently commit to responding to browsers' DNT signals with respect to our websites. In other words, we do not alter our practices with respect to the collection of information based upon a User's selection of the DNT setting or other opt out setting.

4.4 Social Media Features.

Our websites may use social media features or plugins, such as the Facebook "like" button, the Twitter "Tweet" button and other sharing widgets ("Social Media Features"). You may be given the option by such Social Media Features to post information about your activities on a website to a profile page of yours that is provided by a third-party social media network in order to share with others within your network. Social Media Features are either hosted by the respective social media network or hosted directly on our website. To the extent the Social Media Features are hosted by the respective social media networks, the latter may receive information that you have visited our website from your IP address. If you are logged into your social media account, it is possible that the respective social media network can link your visit of our websites with your social media profile.

Your interactions with Social Media Features are governed by the privacy policies of the companies providing the relevant Social Media Features. Be aware that if you post or share any distinguishing information anywhere online and corresponding information is available via your public social media account, profile or other accessible information you could be identified, located and contacted as a result.

4.5 Notice to California Residents.

If you are a resident of California, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Data by the Company to a third party for the third party's direct marketing purposes. The right granted to California residents applies only to their activities within the State of California. To make such a request, please send an email to CAPrivacy@earnslt.com or write us at:

Earn DLT, Inc.
85 Broad Street, DD-29
New York, NY 10004
Attn: CA Privacy Rights

5. Purposes for Which We Process Personal Data and the Legal Basis upon Which We Rely.

5.1 To Provide You with the Services.

We will process your Personal Data to the extent this is necessary for the performance of our contract with you for the use of our websites and platform and to fulfill our obligations under our

Terms of Use and other applicable contracts with you; where we have not entered into a contract with you (or where our Terms of Use do not apply), we base the processing of your Personal Data on our legitimate interest to operate and administer our websites and to provide you with content you access and request. Examples of how we use your Personal Data in connection with the provision of Service include:

- To confirm the accredited status of our Users;
- To perform KYC and AML checks on our Users, and otherwise manage identity verification;
- To process investments and trades you make on our platform;
- To establish and manage your account, including to communicate with you about changes or updates to our Services, technical and security alerts, account verification, support, etc.;
- To track access to transaction materials through our platform;
- To record transaction information in our proprietary permissioned blockchain and distributed ledger technology; and
- To provide, operate, maintain, improve, and monitor the effectiveness and security of our Services.

5.2 Marketing. We will process your Personal Data to alert you to new developments, offerings, promotions, specials, special events, products or services or other activities and to administer same to the extent it is necessary for our legitimate interests to advertise our websites or, where necessary, to the extent you have provided your prior separate consent (please also view “Your Rights Relating to your Personal Data” below to learn how you can control how your Personal Data is processed by the Company for marketing purposes).

5.3 User’s requests. For the purposes for which you provided the information, for the legitimate business purpose of fulfilling our User’s requests.

5.4 Administration of Services. To monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems of our websites, for the legitimate business interest of operating and administering our websites, platform and other Services.

5.5 Anonymous Analytics. To carry out internal operations and to analyze our Users’ demographics and interests on an anonymous basis by de-identifying certain demographic Personal Data from our User’s names or other personally identifiable information, for the legitimate business interests of understanding our current and potential User demographics.

5.6 Security. For fraud prevention, internal operations, legal compliance, and other public and security related purposes, to the extent this is necessary for the purpose of our legitimate interests in

promoting the safety and security of the systems and application used for our websites, and protecting our rights and the rights of others;

5.7 Contract Enforcement. We will process your Personal Data to enforce our Terms of Use and any of our other policies and/or agreements with our Users on the basis of the performance of our contract with you.

5.8 Legal Compliance. We will process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights, and is necessary for our legitimate interests to protect against misuse or abuse of our websites, to protect personal property or safety, to pursue remedies available to us and limit our damages, to comply with a judicial proceedings, court order or legal process, and/or to respond to lawful requests.

5.9 With your consent. We will request your consent to use your Personal Data where required by law, such as where we use certain cookies or similar technologies or would like to send you certain marketing messages. If we request your consent to use your Personal Data, you have the right to withdraw your consent any time in the manner indicated when we requested the consent or by contacting us. If you have consented to receive marketing communications from our third-party partners, you may withdraw your consent by contacting those partners directly.

6. Who do we share Personal Data with?

6.1 Social Media/Advertising Networks. We share Personal Data with third-party social networks, advertising networks and websites, which usually act as separate controllers, so that the Company can market and advertise on third party platforms and websites.

6.2 Advisors. In individual cases we may also share Personal Data with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services

6.3 Internal Disclosures. We may share Personal Data with our headquarters and affiliates, other companies and brands owned or controlled by Earn and other companies owned by or under common ownership as Earn, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. Personal Data will only be available to those who need such access for purposes consistent with this Privacy Policy or where required by applicable law.

6.4 Service Providers. We engage certain trusted third-parties to perform functions and provide services to us (e.g., verification providers, website hosting providers and other parties who assist us in operating our websites, conducting our business, managing our marketing campaigns and mailings, performing tax and accounting activities, performing analytics, or serving our customers).

We may share your Personal Data with these third-parties, but only to the extent necessary to perform these functions and provide such services. We also require these third-parties to maintain the privacy and security of the Personal Data they process on our behalf.

6.5 **Broker-Dealer.** Certain investment opportunities that are available through the Services may be offered by a broker-dealer, which may be an affiliate of Earn or an unaffiliated third-party. Broker-dealers are securities professionals that are registered with the US Securities and Exchange Commission and are members of FINRA. We may disclose Personal Data to broker-dealers in connection with their offerings. Where an offering is made by a broker-dealer and you seek to participate in that offering, we are required to disclose Personal Data to that broker-dealer to comply with applicable US laws. The broker-dealer's use of Personal Data is subject to its privacy policy. The offering documents will disclose the broker-dealer associated with an offering before you make an investment through the Services.

6.6 **Issuers.** We may disclose Personal Data to the Issuer of a security or other asset underlying a Token in which you have signed a subscription agreement, invested, or otherwise contracted for. For example, when you make an investment with an Issuer, we may disclose information such as name and contact details, Social Security Number or tax identification number, and results of investor verification and confirmation that an investor is eligible to participate in the offering. If you seek to contact the Issuer through the Service (e.g., to ask a question), we will disclose your contact information to the Issuer. An Issuer typically needs this information for its own legal compliance and to maintain its ledger of investors. However, we do not control how an Issuer uses the Personal Data that we provide to it.

6.7 **CRM.** We may share certain Personal Data with a customer relations management company.

6.8 **Other Disclosures.** If we are involved in a merger or reorganization, a financing that involves due diligence, bankruptcy, receivership, transition to different service providers, sell business unit, or if all or a portion of our business, assets or stock are acquired by another company, we may transfer some or all of your Personal Data to such third party. In accordance with applicable laws, we will use reasonable efforts to notify you of any such transfer of Personal Data to an unaffiliated third party as processing of your Personal Data will be required for the purposes set out in "Purposes for Which We Process Personal Data and on Which Legal Basis" section above.

7. **Children**

Our websites are not directed at children. We do not knowingly collect Personal Data from children under the age of 13. The Services are intended for Users over the age of 18. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us as described in the "Contacting Us" section below and we will take steps to delete such Personal Data from our systems.

8. **How long do we keep your Personal Data?**

We determine the appropriate retention period for Personal Data on the basis of the amount, nature, contact frequency and sensitivity of your Personal Data, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements (such as applicable statutes of limitation). We may retain your Personal Data for a period of time consistent with the original purpose of collection (see “Purposes for Which We Process Personal Data and on What Legal Basis” section above). Certain usage data, including data related to User access to transaction materials, may be retained up to ten (10) years. Data may otherwise be retained in aggregated, deidentified form for an unrestricted period of time in order to provide the Services.

Information recorded on distributed ledger technologies may be retained as part of the blockchain indefinitely, as such information is necessary to maintain the transaction history of Tokens. By using the Services, you acknowledge that Earn has a legal obligation to maintain the blockchain in order to provide to the Services, including retaining Issuer information, tax identification information, and transaction history.

9. **Your Rights Relating to your Personal Data.**

9.1 Your Rights.

You may have certain rights regarding your Personal Data, **subject to local data protection laws**. To the extent Earn is the processor or controller of your Personal Data, as described in Section 1, These may or may not include the following rights:

- to access your Personal Data held by us (right to access);
- to rectify inaccurate Personal Data and ensure it is complete (right to rectification);
- to erase/delete your Personal Data to the extent permitted by other legal obligations, including maintaining a distributed ledger for the provision of Services (right to erasure; right to be forgotten);
- to restrict our processing of your Personal Data (right to restriction of processing);
- to transfer your Personal Data to another controller to the extent possible (right to data portability);
- to object to any processing of your Personal Data carried out on the basis of our legitimate interests (right to object). Where we process your Personal Data for direct marketing purposes or if we share it with third-parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- not to be subject to a decision based solely on automated processing, including profiling,

which produces legal effects (“Automated Decision-Making”); Automated Decision-Making currently does not take place on our websites;

- to the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

The specific rights to which you are entitled are based upon your geographic location, and the location of where your Personal Data is stored. Users who are located within Member States of the European Union, countries in the European Economic Area, the United Kingdom, and Switzerland (collectively, “Europe” or “European”) may avail themselves of all of the above-referenced rights.

9.2 How to exercise your rights.

To exercise your rights, please contact us in accordance with the “Contacting Us” section below. We try to respond to all legitimate requests within one month and will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than a month, considering the complexity and number of requests we receive.

In addition, if you have registered for an account with us, you may generally update your User settings, profile, organization’s settings or event registration by logging into the applicable website with your username and password and editing your settings or profile. To update your financial information, discontinue your account, and/or request return or deletion of your Personal Data and other information associated with your account, please contact us.

9.3 Your preferences for marketing communications.

If we process your Personal Data for the purpose of sending you marketing communications, you may manage your receipt of marketing and non-transactional communications from us by clicking on the “unsubscribe” link located on the bottom of our marketing emails, by replying or texting ‘STOP’ if you receive SMS communications, or by turning off push notifications on any of our apps installed on your device. Additionally, you may unsubscribe by contacting us using the information in the “Contacting Us” section below. Please note that opting-out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as information about your subscriptions or event registrations, service announcements or security information.

9.4 International Data Transfers.

Earn is headquartered in the United States and has service providers in other countries, and your Personal Data may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as

those in your jurisdiction.

Personal Data may be transferred beyond the United States in connection with our use of Amazon Web Services ("AWS") for infrastructure, databases, DNS, etc. Their privacy policy can be found [here](#). By using the Services, you acknowledge and agree that Earn does not control nor take responsibility for the transfer of data across AWS' infrastructure, including across transmissions over international boundaries within AWS' own systems.

European Users should read the important information provided [here](#) about transfer of Personal Data outside of Europe.

10. Security

We take precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the Personal Data we process or use.

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password and other access credentials, including access codes Earn provides, limiting access to your devices, and signing out of websites after your sessions. If you have any questions about the security of our websites, please contact us via the "Contacting Us" section below.

11. Changes to this Privacy Policy

We will update this Privacy Policy from time to time in our sole discretion to reflect changes in our practices, technology, legal requirements and other factors. If we do, we will update the "effective date" at the top of this Privacy Policy. If we make an update, we may provide you with notice prior to the update taking effect, such as by posting a conspicuous notice on our website or by contacting you using the email address you provided.

We encourage you to periodically review this Privacy Policy to stay informed about our collection, processing and sharing of your Personal Data.

12. Contacting Us

To exercise your rights regarding your Personal Data, or if you have questions regarding this Privacy Policy or our privacy practices please mail us at:

Earn DLT, Inc. Data Protection and Privacy
85 Broad Street, DD-29
New York, NY 10004
Privacy@earndlt.com

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.

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