

## Rumpel - Privacy Policy

Last Modified: Sept 9th 2024

### Introduction

Rumpel Labs (“**Company**”, “**us**” or “**we**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy. This policy describes the types of information we may collect from you or that you may provide when you visit our website <https://rumpel.xyz> (the “**Website**” and together with our proprietary application accessible therefrom, the “**Services**”), when you create an account with us to use the Services, if such functionality is available, and our data collection and handling practices.

This privacy policy is part of the [Terms of Use](#) applicable to the use of our Services. Please review this policy together with the [Terms of Use](#), to understand all of your rights and obligations, and how we operate our Services.

YOU ACKNOWLEDGE THAT WE USE SERVICE PROVIDERS TO MAKE OUR SERVICES AVAILABLE TO YOU, AND THAT THESE SERVICE PROVIDERS MAY INTERCEPT YOUR COMMUNICATIONS, OR TRACK YOUR ACTIVITIES. BY USING OUR SERVICES, YOU SPECIFICALLY CONSENT TO THIS INTERCEPTION, TRACKING AND DATA COLLECTION BY OUR THIRD PARTY SERVICE PROVIDERS.

This privacy policy applies to information we collect:

- On the Website;
- On or through the Services;
- In email, text, and other electronic messages between you and the Services;
- Through mobile and desktop applications, if any, that you download from the Services, if this policy is posted to them;
- When you interact with our advertising and applications on third-party websites and services, if such advertising or applications include links to this policy; and
- Through any other means associated with or relating to the Services.

This policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using the Services, you agree to the terms of this privacy policy.

**This privacy policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the privacy policy periodically for updates.**

### Information about Children

Our Services are not intended for children under eighteen (18) years of age. No one under age eighteen (18) may provide any personal information to us or on or through the Services.

We do not knowingly collect personal information from children under the age of sixteen (16). If you are under sixteen (16), do not use or provide any information on the Services or on or through any of its features or register on the Services (if such feature is available), make any purchases through the Services (if such feature is available), use any of the interactive or public comment features of the Services (if such feature is available) or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal information from a child under sixteen (16) years of age, we will delete that information. If you believe we might have any information from or about a child under the age of sixteen (16), please contact us at [contact@sense.finance](mailto:contact@sense.finance)

### **Information We Collect About You and How We Collect It**

We may collect several types of information from and about users of our Services (some of which is considered “**personal information**” pursuant to applicable law), including:

- Identifiers, such as name, mailing address, e-mail address, telephone number, or any other information that the Services collects, which applicable law may consider personally identifiable, personal information, personal data, and other such designations;
- Information about the device you use to access the Services;
- Information about your cryptocurrency wallet IDs, transaction history, trading data and associated fees paid;
- Information about the transactions you engage in, such as the type of transaction, transaction amount, transaction signatures, and timestamp;
- Your activity on the Services, including your posts and any information contained therein;
- We collect information on links you interact with across our services (including in our emails sent to you);
- Information regarding the reward points you have earned or are eligible to receive from third-party protocols;
- Your IP address, Identifier for Advertisers (“**IDFA**”), Android/Google Advertising ID, International Mobile Equipment Identity (“**IMEI**”), or another unique identifier;
- Your device characteristics and functionality (including information about your operating system, hardware, mobile network, browser, browser language, etc.);
- Referring and exit web pages and URLs;
- Your browsing history, including the areas within our Services that you visit and your activities there, including remembering you and your preferences;
- Your device location or other geolocation information;
- Certain other device data, including the time of day you visit our Services; and
- Information about your internet connection and internet provider.

We collect this information:

- Directly from you when you provide it to us, such as when filling in forms on the Services (including when you register for an account, subscribing to a service, or requesting something from us, or when you fill out surveys, if any such features are available to you).
- Automatically as you navigate through the Services, including through the use of cookies, web beacons, and other tracking technologies (including information about your network or computing device) and analytics services;
- From third parties, for example, our business partners and service providers;
- Records and copies of your correspondence (including email addresses), if you contact us through the Services;
- When you engage in transactions on our Services;

- When you run searches on our Services; and
- When you contact our customer service agents, if available.

### **Automatic Data Collection Technologies**

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about you, your equipment, your technology providers, and your activities, including:

- Details of your visits to our Services, including traffic data, browsing patterns, location data, logs, and other communication data and the resources that you access and use on the Services; and
- Information about your device and about your internet connection and service provider, as set forth above.

You acknowledge and understand that our service providers will be collecting information about you, and may monitor and intercept your communications and actions on our Services as you browse, interact with or use certain functionality, such as chat features. These service providers may use the information they collect for their own benefit, without any restriction. You specifically agree to this arrangement, and consent to your communications and information being intercepted by our third party providers.

The information we collect automatically may be statistical data and may also include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. This information enables us to:

- Allow you to use and access the Services;
- Prevent fraudulent activity and improve security functionality;
- Assess the performance of the Services, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Services;
- Offer you enhanced functionality when accessing the Services, including identifying you when you sign into our Services, and keeping track of your specified preferences;
- Deliver content relevant to your interests on our Services and third-party sites based on how you interact with our advertisements and/or content;
- Estimate our audience size and usage patterns;
- Speed up your searches; and
- Analyze our services and products and perform market research.

When you visit or leave our Services by clicking a hyperlink or when you view a third-party site that includes our plugins or cookies (or similar technology), we may automatically receive the URL of the site from which you came or the one to which you are directed.

We may also receive location data passed to us from third-party services or GPS-enabled devices that you have set up, which we may use for fraud prevention and security purposes, among other uses. We may use this information to provide customized services, content, and other information that may be of interest to you. If you no longer wish for us, our affiliates, or our service providers to collect and use location information, you may disable the location features on your device. Consult your device manufacturer settings for instructions on how to do this. Please note that if you disable such features, your ability to access certain features, services, content, or products may be limited or disabled.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. Note that while you can set your browser to not allow cookies, we may not be

able to honor that request, and may track your activity and collect information about you and your online activities even when the browser is set to “do not track”;

- **Flash Cookies.** Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Services. Flash cookies are not managed by the same browser settings as are used for browser cookies and you may not be able to shut down our collection of and use of information through this technology;
- **Web Beacons, Pixels and Tags.** Pages of our Services and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity);
- **Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with the Services, such as information about the links you click on;
- **ETag, or entity tag.** An ETag, or entity tag, is a feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. It is one of several mechanisms that HTTP provides for web cache validation. These allow websites to be more efficient and not serve content again, when data is already cached and ready to view;
- **Fingerprinting.** Fingerprinting refers to the collection and analysis of information from your device, such as your operating system, plug-ins, system fonts and other data, for purposes of identification;
- **Recognition Technologies.** Recognition technologies refers to various technology features used by websites, including application of statistical probability to data sets, which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user); and
- **Log Files.** These track actions occurring on our Services, and help us collect your IP address, browser type, Internet service provider, the webpages from which you came or to which you go before and after visiting our Services, and the date and time of your visits.

## Behavioral Advertising

We may use your personal information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of certain targeted advertising, and learn more about your options related to such advertising, by using the links below:

- **Facebook:** You can learn more about customizing your Facebook advertising preferences by visiting <https://www.facebook.com/help/109378269482053>. You can learn more about turning off Facebook’s integration with websites that you have connected to your Facebook account by visiting <https://www.facebook.com/help/211829542181913>.
- **Google:** You can customize your experience with advertisements through Google services by visiting <https://support.google.com/ads/answer/2662856/control-the-ads-you-see-android?hl=en>. You can opt out of having your website activity available to Google Analytics by visiting <https://support.google.com/analytics/answer/181881?hl=en> and installing the Google Analytics opt-out browser add-on available at <https://chrome.google.com/webstore/detail/google-analytics-opt-out/flloajicojecljbmefodhfapmkgchbnh?hl=en>.
- **Hotjar:** You can learn more about limiting Hotjar’s collection of your data by visiting <https://www.hotjar.com/policies/do-not-track/>.

- **Pinterest:** You can learn more about customizing or limiting Pinterest’s collection of your data by visiting <https://help.pinterest.com/en/article/do-not-track>.
- **Bing:** <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>.

## Do Not Track

Do Not Track (“DNT”) is a concept promoted by certain regulatory authorities and industry groups for development and implementation of a mechanism that would allow internet users to control the tracking of their online activities across websites. Currently, various browsers (including Internet Explorer, Firefox, and Safari) offer a DNT option that allows a user to set a preference in the browser to not have his/her activities on the internet tracked. You can usually access your browser's DNT option in your browser's preferences. When a user’s browser is set to DNT, some cookies and other tracking technologies may become inactive, depending on how the website visited responds to DNT browser settings. If that occurs, the website visited will not recognize you upon return to that website, save your passwords or user names, and some other features of a website may become unavailable or not function properly.

Given the lack of a standard in the industry or any clear regulatory guidance on this issue, we do not comply with DNT signals from your browser at this time.

## Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Services may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Services. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## How We Use Your Information

We may use information that we collect about you or that you provide to us, including any personal information:

- To present our Services and their contents to you;
- To provide you with information, products, or services that you request from us;
- To fulfill any other purpose for which you provide it;
- To provide customer support, if such features are available;
- To enable you to engage in transactions;
- To provide you with notices about your account and/or the Services;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection, if needed;
- To notify you about changes to our Services or any products or services we offer or provide though it;
- To allow you to participate in interactive features on our Services, if any;
- To develop and improve our products and services;
- For security and anti-fraud purposes;
- For behavioral tracking, profiling and advertising;
- For any other purpose as needed for our business;
- In any other way we may describe when you provide the information;
- For any other purpose with your consent;

- To contact you about our own and third-parties' goods and services that we think may be of interest to you; and
- To enable us to display advertisements to our advertisers' target audiences.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To third-party protocols that have issued reward points to you;
- To our affiliates;
- To contractors, service providers, and other third parties we use to support our business and assist us in providing services and offering our products;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our Services' users is among the assets transferred;
- To third parties to market their products or services to you;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; and
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request;
- To enforce or apply the [Terms of Use](#), including this privacy policy, and any other agreements between us, including for billing and collection purposes; and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **International Data Transfers**

We, our affiliates, subsidiaries, and third-party providers may process your personal information outside of your home country. Data privacy laws in the countries to which your personal information is transferred may not be equivalent to, or as protective as, the laws in your home country. You hereby consent to the transfer of your information to other countries, and hereby hold us harmless from and against any losses or damages you may suffer as a result of such transfers.

### **Data Security**

We have implemented measures intended to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure while you use our Services (but please note that all of your trading information and digital asset transactions will also be available on third-party protocols, and we have no control over such features or other applicable technologies or services).

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password or private keys for access to certain parts of our Services, you are responsible for keeping this information confidential. We ask you not to share your password or keys with anyone and to change your password from time to time, if applicable. We also highly recommend that you

use a password that is dissimilar to and cannot be easily found by unauthorized third parties who may have obtained your login credentials to other sites. Keep in mind that if you use the same password for all websites, if someone obtains your credentials for one site, they may be able to then use those credentials to log into any other site you use.

Unfortunately, the transmission of information via the internet is not completely secure. Although we try to protect your personal information, we cannot guarantee the security of your personal information transmitted through or collected through the use of our Services. Any transmission of personal information is at your own risk.

We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

### **California Residents**

California Civil Code Section § 1798.83, known as the “Shine The Light” law, permits users of our Site who are California residents to request and obtain from us a list of what Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding year, and the names and addresses of those third parties. You may request this information from us no more than once a year, but such request will be handled by us free of charge to you. To make such a request, please send an email to [contact@sense.finance](mailto:contact@sense.finance).

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account, if applicable. We may also post a notice on the Website's home page. The date this privacy policy was last revised is identified at the top of this page. You are responsible for periodically visiting our Services and this privacy policy to check for any changes.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

E-mail: [contact@sense.finance](mailto:contact@sense.finance)