

BankerLabs Privacy Policy

Effective Date: April 1, 2025

Introduction

BankerLabs (“we”, “our”, “us”, and “Bank”) owns and operates the Bank web application (the “**Application**”) that provides users with the opportunity to engage and interact with the BankFi protocol and associated BankFi features. This Privacy Policy describes the ways that we collect, use, and disclose your personal information in connection with your access to and use of the Application and the services that are available on and through the Application (collectively, the “**Services**”). We will only collect, use, and disclose your personal information in connection with your access to and use of the Application and Services in accordance with this Privacy Policy and as otherwise required by applicable law.

Please read this Privacy Policy carefully. By downloading, accessing, or using our Application or Services, you confirm that you understand, accept, and consent to the collection, use, and disclosure of your personal information as described in this Privacy Policy. You may withdraw your consent to our collection, use, and disclosure of your personal information at any time. If you withdraw your consent, we may not be able to provide you with access to or use of certain features, functionality, or communications that are available on and through the Application and Services.

Application of this Privacy Policy

Bank is subject to the privacy legislation within the United States in the states in which the Application is being accessed. Privacy laws vary by jurisdiction. You acknowledge and agree that access to the Application and Services that are provided via the Internet and that your information, including personal information, may be: (i) transferred across state, provincial, and national borders; and (ii) stored or processed in accordance with the terms and conditions of this Privacy Policy.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be consistent with privacy requirements for all jurisdictions.

Minors

Our Application and Services are not intended for minors. We do not knowingly collect personal information from minors. If you are a minor, do not use our Application or provide any information about yourself to us. If we learn we have collected or received personal information from a minor, we will delete that information and any accounts associated with the minor. If you believe we might have any personal information from or about a minor, please contact our Privacy Department using the details below.

What is “personal information”?

For the purposes of this Privacy Policy, “**personal information**” is any information about an identifiable individual, which includes information that can be used on its own or with other information to identify a specific individual.

Public Audience

You acknowledge and agree that certain of your personal information may be displayed on the Application to the public and can be seen by anyone who visits the Application. Any personal information that you share with a public audience can be seen, accessed, reshared, included in search results, and downloaded. The personal information that you provide to us is made available to a public audience in the following circumstances:

- Your cryptocurrency wallet address and username, in connection with leaderboards, activity feeds, games, and other functionalities available through the Application. BankFi is a public protocol, and all activity on BankFi may be viewed publicly both in the Application and on the blockchain.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. We include the date that this Privacy Policy was last revised at the top of the page. You are responsible for checking this page periodically for updates to our Privacy Policy, as your continued access to or use of the Application or Services after we make changes confirms that you accept and consent to those changes. If we make any material changes to this Privacy Policy or the way that we collect, use, or disclose your personal information, we will notify you via email, if available, or through a notice on our Application as required by applicable laws.

What personal information do we collect?

We collect and maintain different types of personal information in respect of the individuals with whom we interact. When you use our Application or Services, we may collect the following personal information from you:

- personal contact and identification information, such as your name, email address, and IP address;
- account information, such as your username and cryptocurrency wallet when you sign up for an account;
- personal information that you create, submit, post, upload, publish, or otherwise make available to us on or through the Application; and
- personal information that you include in any feedback or communication that you provide to us.

We may also collect information from you that is not considered personal information, such as statistical or aggregate information about how users interact with our Application or Services.

How do we collect your personal information?

We collect personal information when you provide that information to us directly, including:

- when you scan our QR code;
- when you create an account on our Application;
- when you make or submit an inquiry, question, or complaint;
- when you opt into our mailing list or to receive other communications from us or our partners;
- when you interact with the features on our Application or Services;
- when you respond to our emails, text messages, or other communications;
- when you make purchases on or through the Application or Services; and
- when you fill in forms or enter other information on our Application or Services.

Why do we collect and how do we use your personal information?

We collect personal information to provide you with the Services that are available on and through the Application and which enables us to manage, maintain, and develop our business and operations. For example, we collect and use personal information for the following purposes:

- to establish, maintain, and manage our relationship with you, including by contacting you, so that we may provide you with any services or communications that you have requested;
- to present the Application and Services to you;
- to provide and personalize information, services, or products you request from us;

- to interact with you through the features on our Application and Services;
- to allow you to register for, access, and participate in interactive features, social media, or similar features on our Application and Services;
- to answer your inquiries, questions, and complaints;
- for administrative, planning, product or service development, quality control, and research purposes;
- for marketing;
- to notify you about changes to our Application or any products or services we offer or provide;
- to protect us against error, fraud, theft, and damage to our Application, Services, assets, or other properties;
- to update our records and keep your personal information up to date;
- to process and respond to any complaint made by you;
- to enable us to comply with applicable laws or regulatory processes;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

By consenting to the collection, use, and disclosure of your personal information through our Application and Services, you allow us to fulfill the purposes for which we collect your personal information. When we collect your personal information for research, statistical, and development purposes, we ensure that any information used for our analysis and reports will be de-identified and aggregated in a manner that will not identify you. This de-identified information may be disclosed to third parties.

When and to whom do we disclose your personal information?

We may disclose personal information that we collect from you for the purposes and in the circumstances set out below:

- **To the Public Audience.** As part of some engagement features and functionalities, certain personal information from your account may be shared and viewed by the public. For example, your username may be shared as part of a leaderboard or as a recipient of a contest prize. Please be careful and ensure that the personal information you include on your account is material that you are comfortable with being publicly viewable, since neither you nor we can control what others do with your personal information once you share it as part of access to or use of the Application or Services.
- **To Comply with Legal Requirements.** Your personal information may also be disclosed:
 - as permitted or required by applicable law or regulatory requirements;
 - to comply with valid legal processes, such as search warrants, subpoenas, or court orders;
 - as part of our regular reporting activities under applicable law to protect our rights and property;
 - during emergency situations or where necessary to protect the safety of a person or group of persons; and
 - for any additional purposes for which we have obtained your consent to disclose your personal information.

Since we may share your personal information with third parties, as described in this Privacy Policy, your personal information may be collected, used, processed, stored, or disclosed outside of your jurisdiction of residence, including in the United States. As such, your personal information may potentially be accessible to law enforcement and national security authorities of another jurisdiction where local laws provide for a different level of protection for personal information. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security agencies in those other countries may be entitled to access your personal information.

If you would like further information about our policies and practices regarding the third parties (including our service providers) with whom we disclose your personal information and how these third parties collect, use, disclose, and store personal information, please contact our Privacy Department using the contact details below.

By providing your personal information to us, you consent to our disclosure of this information to our service providers (and other third parties) as described in this Privacy Policy, including those that may be located outside of your jurisdiction of residence.

How do we use cookies?

A “cookie” is a small summary file containing a unique ID number. When you access our Application, we may use cookies or similar automatic data collection technologies, including third-party cookies such as Vercel Analytics, to indirectly collect information about you. Cookies enable us to recognize your computer and greet you each time you visit our Application without bothering you with a request to register. Cookies also enable us to keep track of services you view so that, if you consent, we can send you news about those services.

We may also use cookies to measure traffic patterns, determine which areas of our Application have been visited, and measure transaction patterns in the aggregate. We use this information to research our users’ habits so that we can improve our Application and Services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Application may not be accessible or may not function properly.

How do we communicate with you?

We will collect your express consent prior to sending you any marketing communications, unless an exception to obtaining your opt-in consent applies under applicable anti-spam legislation. You will have the opportunity to opt out of receiving marketing communications at any time. For clarity, by using and accessing our Application, you agree to receive transactional communications about your account and activities on or in connection with the Application. For example, if you add an email to receive future communications, a verification email will be sent to your email address.

How is your personal information kept secure?

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where you have used a cryptocurrency wallet for access to certain parts of our Application, you are responsible for keeping this cryptocurrency wallet secured. Do not share your cryptocurrency wallet keys, access, or passphrase with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Application. 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 Application.

How long do we keep your personal information?

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, or until we are no longer required by law to retain it (whichever is the latter). Under some circumstances, we may anonymize or de-identify your personal information so that it can no longer be associated with you.

We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

How can you access or correct your personal information?

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. You have the right to request access to and to correct the personal information that we hold about you. You can review and change your personal information by: (i) logging into the Application and visiting your account profile page; or (ii) contacting our Privacy Department using the contact details below. Before providing access to any information, we will first verify your identity, and you consent to our collection and use of your personal information for verification purposes.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may request specific information from you to help us confirm your identity and to provide you with the personal information that we hold about you or to make your requested changes. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

How can you withdraw consent to the collection, use, and disclosure of your personal information?

Where you have provided your consent to the collection, use, and disclosure of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact our Privacy Department using the contact details below. Please note that if you withdraw your consent, we may not be able to provide our services to you, or your user experience may not be as useful or enjoyable. We will explain the impact to you at the time to help you with your decision.

Links to third-party websites and services

Our Application may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plug-in, please note that these third parties have their own privacy policies, and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

What is the process for complaining about a breach of this Privacy Policy?

If you believe that this Privacy Policy has been breached, please contact our Privacy Department using the contact details below. We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this Privacy Policy, and our compliance with applicable privacy laws. We will treat your complaint confidentially, investigate the alleged breach, and aim to ensure that we contact you and resolve your complaint within a reasonable time (and in any event, within the time required by the relevant privacy laws, if applicable).

Contact Information

We welcome your questions, comments, and requests regarding this Privacy Policy and our privacy practices. Please contact:

Bank Privacy Department

privacy@bankerlabs.io