

# Privacy Policy

## OVERVIEW

Scorch Team operates this website. Throughout the site, the terms “we”, “us” and “our”, refer to Scorch Team, also referred to as “Scorch”. Scorch Team offers this website, including all information, tools, and services available from this site to you, the user, conditioned upon your acceptance of all terms, conditions, policies, and notices stated here.

By visiting our site, you engage in our “Service” and agree to be bound by this Privacy Policy. Please read this Privacy Policy carefully before accessing or using our website. If you disagree with this policy, then do not use this website.

You can review the most current version of this Privacy Policy at any time on this page. We reserve the right to update, change, or replace any part of this Privacy Policy by posting updates and/or changes to our website. It is your responsibility to check this page periodically for changes. Your continued use of or access to the website after posting any changes constitutes acceptance of those changes.

Scorch Team encourages you to read this Privacy Policy and our Terms of Use and Service to understand how we collect and process Personal Data in the course of providing the Services and your interaction with the Services. By using the Services, you consent to the collection, use, retention, and disclosure of your Personal Data for processing as described and subject to the limitations in this Privacy Statement.

### **Note to Residents of the European Union:**

To comply with the European General Data Protection Regulation (GDPR) requirements for our European users, this Privacy Statement outlines the legal basis for processing your Personal Data. It provides other information required by the GDPR.

### **Note to Californian or USA residents:**

California residents have specific data protection rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). These laws are designed to give California consumers more control over their personal information. Here is an overview of these rights:

#### Right to Know

Consumers have the right to request that a business disclose:

- The categories of personal information it has collected about them.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting, selling, or sharing personal information.
- The categories of third parties to whom the business discloses personal information.
- The specific pieces of personal information the business has collected about them.

#### Right to Delete

Consumers can request the deletion of personal information that a business has collected from them, subject to certain exceptions. Businesses are required to delete personal information upon receiving a verifiable request unless retaining the information is necessary for:

- Completing the transaction for which the personal information was collected.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, or prosecuting those responsible for such activities.
- Complying with a legal obligation.
- Other internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with the business.

#### Right to Opt-Out

Consumers have the right to opt out of the sale or sharing of their personal information. Businesses must provide a "Do Not Sell or Share My Personal Information" link on their websites to facilitate this process.

#### Right to Correct

Consumers have the right to request that businesses correct inaccurate personal information that they maintain about the consumer.

#### Right to Non-Discrimination

Consumers have the right to not be discriminated against for exercising their CCPA/CPRA rights. This means businesses cannot deny goods or services, charge different prices, or provide a different level of quality of goods or services because the consumer exercise their privacy rights.

#### Right to Access Information About Automated Decision-Making

Consumers have the right to access information about the use of automated decision-making technology and to opt out of its use.

#### Right to Limit Use and Disclosure of Sensitive Personal Information

Under the CPRA, consumers have the right to limit the use and disclosure of sensitive personal information, which includes data like Social Security numbers, financial information, and precise geolocation.

#### Right to Data Portability

Consumers can request the transfer of their personal information to another entity. Businesses must provide the requested information in a readily usable format that allows the consumer to transmit this data to another entity without hindrance.

### **PURPOSE**

Protecting your privacy is important to us. Personal Data is any information that would identify a person directly or indirectly in combination with data from other sources. For example, a full name, home or work address, phone number, national identification number (SSN, SIN, etc.), email address, banking details, IP address, biometric data, usage data, or any information that may individually identify a person. Scorch Team may collect Personal Data, including without limitation your name, email address, IP address, wallet address, and device identifiers and/or

geolocation information, in the course of its Services, and we may use or disclose that Personal Data as described with this Privacy Policy.

We may also create de-identified or anonymized data from Personal Data by excluding data components (such as your name, email address, etc.) that make the data able to identify you through obfuscation or other means personally. In addition, we may collect and use aggregated, anonymous information to provide data about the Services to advertisers, potential business partners, and other unaffiliated entities. As this information does not identify a person and is therefore not Personal Data, Scorch Team, when using such aggregated, anonymized, and/or de-identified data, is not subject to this Privacy Statement.

In addition, when using the service, you may also voluntarily upload the following data, and we may keep the corresponding data and use it for our commercial and marketing purposes:

- **Your email address**

In particular, you may elect to share this information with us **when you subscribe to our newsletter**.

We collect this private information to inform you about our products and to target or retarget you or a similar audience through online advertising. If you disagree, please do not provide us with your email address.

## **SECTION 1 - WHAT DO WE DO WITH YOUR INFORMATION?**

When you use our website, we may collect the personal information you voluntarily give us, such as your name, email address, password, API key, and all Proxy Traffic (if applicable) (including all data and metadata you transmit through our Proxy service). We may also automatically receive your computer's internet protocol (IP) address, browser information, operating system, and hardware information to provide us with information that helps us provide you with a better experience on our website, as well as to prevent the usage of bots. Your consent is implied to collect and use such Data to facilitate the use or completion of that transaction initiated by you only.

If you provide us with your email address, you agree that we may contact you by email.

We may also contact you to inform you of our products and services. Once subscribed, you may also unsubscribe to this service by selecting Preferences at the bottom of our emails.

## **SECTION 2 – CONSENT**

How do you get my consent? We will ask you directly for your consent or allow you to say no.

### **How do I withdraw my consent?**

If you change your mind after opting in, you may withdraw your consent for us to contact you for the continued collection, use, or disclosure of your information at any time by contacting our Privacy Compliance Officer (See contact at the end of this page).

## **SECTION 3 – DISCLOSURE**

We may disclose your personal information to government authorities if required by law or if you violate our Terms of Service.

## **SECTION 4 - THIRD-PARTY SERVICE**

In general, the third-party providers we use will only collect, use, and disclose your information to the extent necessary to allow them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their privacy policies concerning the information we must provide them for your purchase-related transactions. We recommend reading their privacy policies so that you may understand how these providers can and/or will handle your personal information. In particular, remember that certain providers may be located in or have facilities in a different jurisdiction than you or us. So, if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. For example, if you are located in the EU, and your transaction is processed by a payment gateway in the United States, your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act. Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

The following is a list of Data services engaged by Scorch Team that may receive anonymized data and Personal Data:-

- GOOGLE CLOUD
- FACEBOOK (META) and INSTAGRAM
- GOOGLE ANALYTICS
- GOOGLE ADS
- X ANALYTICS (formerly TWITTER ANALYTICS)

We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements and not use these services if you disagree with any of their terms.

## **SECTION 5 – SECURITY**

We take reasonable precautions to protect your personal information and follow industry best practices to ensure it is not inappropriately lost, misused, accessed, disclosed, altered, or destroyed.

## **SECTION 7 - TRANSFER OF YOUR DATA TO OTHER COUNTRIES**

The data that Scorch Team processes and data processed by associated services and providers may be stored in servers located in the USA, CANADA, Europe, and/or elsewhere. It may be stored in multiple locations. However, we ensure that regardless of where it is stored, your data is stored in a way consistent with the standards of protection required under applicable law. Where Personal Data is transferred from the European Economic Area to a country that has not received an adequacy decision by the European Commission, Scorch Team relies on appropriate safeguards, such as, for example, the European Commission-approved Standard Contractual Clauses and EU-U.S. Privacy Shield Frameworks, to transfer the Personal Data. By using our Services and submitting your Personal Data, you agree to the transfer, storage, and/or processing of your Personal Data in the locations contemplated above.

## **SECTION 8 - CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated so that you know what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it. If our website or Scorch is acquired or merged with another Scorch, your information may be transferred to the new owners so that we may continue to sell products to you. We reserve the right to modify this privacy policy at any time, so please review it frequently.

## **SECTION 9 – RIGHTS CONCERNING PERSONAL DATA**

Scorch Team is committed to ensuring you retain full access to and control of your Personal Data. To that end, we endeavor to respect your right to be informed regarding the collection, use, and disclosure of Personal Data and your right to correct and access it via this Privacy Statement. If you would like to access, correct, remove, request a copy of, withdraw consent to the collection of your Personal Data, or are looking for any additional information on how your Personal Data may be collected, used, or disclosed by Scorch Team, don't hesitate to get in touch with our Privacy Compliance Officer (See contact at the end of this page). Subject to certain exceptions and limitations prescribed by applicable law, you will be provided with reasonable access to your Personal Data and entitled to have it amended or corrected. In certain circumstances, you may have the right to have your Personal Data, or specific components of your Personal Data, erased by Scorch Team, to have your Personal Data moved, copied, or transmitted from our systems to other systems, or to object to or restrict specific processing of your Personal Data by us. In the event that you wish to inquire about or seek to exercise any of these rights (as they may be applicable), please get in touch with our Privacy Compliance Officer at:

[support@scorchtoken.com](mailto:support@scorchtoken.com)