

MegaETH

Privacy Policy

This Privacy Policy describes how MegaLabs (including all its affiliates and subsidiaries, collectively referred to as, "**MegaETH**," "**we**", "**us**" or "**our**") processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, app, social media pages, marketing activities, live events and other activities described in this Privacy Policy (collectively, the "**Service**")). MegaETH may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

MegaETH is an innovative blockchain platform designed to enhance the speed of transactions on Ethereum. MegaETH provides a real-time blockchain consisting of a decentralized sequencer network designed to enhance Ethereum rollups by offering a faster and more efficient solution for transaction processing. MegaETH enables rollups to leverage Ethereum's security while benefiting from increased transaction speed and reduced costs.

By continuing to access our Service, communicating with us, opting-in when presented with choices or voluntarily providing your personal information to us, you warrant that you are at least 18 years of age and expressly consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. The Service is not intended for use by anyone under 18 years of age.

European Users. Please see the Notice to European Users section below for additional information for individuals located in the European Economic Area or United Kingdom (which we refer to as "Europe", and "European" should be understood accordingly).

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, and phone number.
- **Profile data**, such as the username and password that you may set to establish an account on the Service, wherever you are based, information relating to your wallet address, information relating to any social network accounts that you connect to the Service, your GitHub and/or Discord handle, information relating to NFTs like your Fluffle, information provided when interacting with or accessorizing your Fluffle, information submitted through our in-app blockchain quiz, information about your participation in our contests, promotions, or surveys, and any other information that you add to your account profile.
- **Communications data** based on our exchanges with you, including through the MegaETH community experiences and meetups, technical chats, or when you contact us through the Service, social media, or otherwise.
- **Blockchain data**, such as your blockchain history and other information associated with your linked cryptocurrency wallet, information needed to verify ownership of NFTs, and information needed to facilitate transactions through the Service, such as trading activity, deposits, withdrawals, account balances, token holdings, transaction number, transaction sender and recipient, transaction amount, and other similar data.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Promotion data**, including information you share when you enter a competition or giveaway, such as our in-app blockchain quiz.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources**, such as data providers, social media platforms and data licensors.
- **Our affiliate partners**, such as influencers, and promoters who participate in our paid affiliate programs.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.
- **Third-party services**, such as social media services, that you use to log into, or otherwise link to, your Service account. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Service.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Location data**, such as data collected when you authorize our app/the Service to access your device's location.
- **Communication interaction data** such as your interactions with our email, text or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Tracking Technologies

Cookies and similar technologies. Some of our automatic collection is facilitated by cookies and similar technologies. For more information, see our [Cookie Policy](#). We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide, operate and improve the Service and our business;
- enable security features on the Service;
- establish and maintain your profile on the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- communicate with you about events or contests in which you participate; and
- provide support for the Service, and respond to your requests, questions and feedback.

Service personalization. We may use your personal information to:

- understand your needs and interests;
- personalize your experience with the Service and our Service-related communications; and
- remember your selections and preferences as you navigate webpages.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us

understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section below.

Events, promotions and contests. We may use your personal information to:

- administer promotions and contests;
- communicate with you about promotions or contests in which you participate; and
- contact or market to you after collecting your personal information at an event.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Data sharing in the context of corporate events, we may share certain personal information in the context of actual or prospective corporate events – for more information, see the '**How we share your personal information**' section, below.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Further uses. In some cases, we may use your personal information for further uses, in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

How we share your personal information

We may share your personal information with the following parties (or as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection).

Affiliates. We may share or disclose the information we collect from you to our affiliates, such as parent, subsidiaries and affiliated entities, to help us operate the Services or our business; if we do so, their use and disclosure of your personal information will be maintained by such affiliates in accordance with this Privacy Policy.

Service providers. Third parties that provide services on our behalf or help us operate the Services or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

Cryptocurrency platforms. We may share your personal information, such as information to link your virtual wallet to the Services and information about your activities on the Services, with your chosen cryptocurrency platform, such as Ethereum. Please review the privacy policies for the relevant cryptocurrency platform to learn how they may use your personal information. For example, Ethereum's privacy policy is available at <https://ethereum.org/en/privacy-policy/>.

Advertising partners. Third-party advertising companies for the [interest-based advertising purposes](#) described above.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with third-party advertisers with whom we are collaborating to offer you additional services such as sweepstakes, raffles, and promotions. We will share personal information that is needed for these other companies to provide the services that you have requested.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Linked third-party services. If you link your account to a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in MegaETH, financing of MegaETH, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of MegaETH as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in Europe can find additional information about their rights below.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account [and accessing your account settings](#). If you do not have an account and if you wish to access or amend any other personal information we hold about you, you may request access by contacting us at privacy@megaeth.technology.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Cookies. For more information about cookies and similar technologies employed by the Service and how to manage your preferences, see our [Cookie Policy](#).

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

Due to the international nature of our business, your personal information may be transferred to other jurisdictions or locations where privacy laws may not be as protective as those in your state, province, or country. By using the Services, you understand and acknowledge that we may transfer your personal information to service providers or other third parties who are located in jurisdictions or locations which may not provide the same protections as the data protection laws where you are based.

Users in Europe should also read the important information provided below about transfers of personal information to recipients outside Europe contained in the 'Notice to European Users' section.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

If you have any questions about this Privacy Policy, please contact us by email at privacy@megaeth.technology.

Notice to European Users

General

Where this Notice to European users applies. The information provided in this 'Notice to European users' section applies only to individuals located in the European Economic Area (EEA) or United Kingdom (UK) (i.e., "**Europe**" as defined at the top of this Privacy Policy).

Personal information. References to "personal information" in this Privacy Policy should be understood to include a reference to "personal data" as defined in the "**GDPR**" (i.e., the General Data Protection Regulation 2016/679 ("**EU GDPR**")) and the EU GDPR as it forms part of the laws of the United Kingdom ("**UK GDPR**") Under the GDPR, "personal data" means information about individuals from which they are either directly identified or can be identified. The personal information that we collect from and about you is described in greater detail in the section "Personal Information we collect" that is set out above.

Controller. MegaETH is the "controller" in respect of the processing of your personal information covered by this Privacy Policy for purposes of the GDPR. See the '[How to contact us](#)' section above for our contact details.

Our GDPR Representatives. We have appointed the following representatives in Europe as required by the GDPR – you can contact them directly should you wish:

Our Representative in the EU. Our EU representative appointed under the EU GDPR is European Data Protection Office (EDPO). You can contact EDPO regarding matters pertaining to the EU GDPR:

- by using EDPO's online request form: <https://edpo.com/gdpr-data-request/>.
- by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium.

Our Representative in the UK. Our UK representative appointed under the UK GDPR is EDPO UK Ltd. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>.
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom.

Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a "legal basis" for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information in order to deliver the Service to you, or where you have asked us to take specific action which requires us to process your personal information ("**Contractual Necessity**").
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests ("**Legitimate Interests**"). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.

- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see the [‘How we use your personal information’](#) section above and the description of associated data sharing relevant to such purposes set out in the [‘How we share your personal information’](#) section also above.

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<ul style="list-style-type: none"> • Contact data • Profile data • Communications data • Blockchain data • Data from Third-Party Sources • Device data 	<ul style="list-style-type: none"> • Contractual Necessity. • Legitimate Interests. We have a legitimate interest in ensuring the ongoing security and proper operation of our Service (including, where relevant, responding to any contact via any “contact us” feature or similar), our business and associated IT services, systems and networks.
Service personalization	<ul style="list-style-type: none"> • Profile data • Data from Third-Party Sources • Device data 	<ul style="list-style-type: none"> • Legitimate Interests. We have a legitimate interest in providing you with a good service via the Service, which is personalized to you and that remembers your selections and preferences. • Consent, in respect of any optional processing relevant to personalization (including processing directly associated with any optional cookies used for this purpose).
Service improvement and analytics	<ul style="list-style-type: none"> • Contact data • Profile data • Communications data • Blockchain data • Data from Third Party Sources • Device data • Online activity data • Communication interaction data 	<ul style="list-style-type: none"> • Legitimate Interests. We have a legitimate interest in providing you with a good service and analysing how you use it so that we can improve it over time, as well as developing and growing our business. • Consent, in respect of any optional cookies used for this purpose.

Purpose	Categories of personal information involved	Legal basis
Direct marketing	<ul style="list-style-type: none"> • Contact data • Marketing data • Data from Third Party Sources 	<ul style="list-style-type: none"> • Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose. • Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.
Interest-based advertising	<ul style="list-style-type: none"> • Device data • Online activity data • Data from third-party Sources 	<ul style="list-style-type: none"> • Consent
Events, promotions and contests	<ul style="list-style-type: none"> • Contact data • Profile data • Promotion data • Data from Third-party Sources 	<ul style="list-style-type: none"> • Contractual Necessity, to administer events in accordance with the terms or rules thereof (including communicating with you as and where necessary). • In respect of promoting these events: <ul style="list-style-type: none"> ○ Legitimate Interests – we have a legitimate interest in promoting these events, including associated publicising of our business and operations. ○ Consent – in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given promotional communications.

Purpose	Categories of personal information involved	Legal basis
Compliance and protection	<ul style="list-style-type: none"> Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> Compliance with Law. Legitimate Interests. Where Compliance with Law is not applicable, we have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our rights, property, and/or safety.
Data sharing in the context of corporate events	<ul style="list-style-type: none"> Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> Legitimate Interests. We have a legitimate interest in providing information to relevant third parties who are involved in an actual or prospective corporate event (including to enable them to investigate – and, where relevant, to continue to operate – all or relevant part(s) of our operations).
To create aggregated, de-identified and/or anonymized data	<ul style="list-style-type: none"> Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> Legitimate Interests. We have legitimate interest in taking steps to preserve the privacy of our users.
Further uses	<ul style="list-style-type: none"> Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the personal information was collected. Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

Other information

No obligation to provide personal information. You do not have to provide personal information to us. However, where we need to process your personal information either to comply with applicable law or to deliver our Service to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Service to you. We will notify you if this is the case at the time.

No sensitive information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership, or biometric or genetics characteristic other than as requested by us as part of the Service) on or

through the Service, or otherwise to us. If you provide us with any such sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

No automated decision-making and profiling. As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects.

Your additional rights

General. European data protection laws may give you certain rights regarding your personal information in certain circumstances. If you are located in Europe and to the extent technically possible in the context of blockchain technology, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it – you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer to you or a third party of your choice a machine-readable copy of your personal information which you have provided to us.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

Exercising These Rights. You may submit these requests by email to privacy@megaeth.technology. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month of receipt. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

Your Right to Lodge a Complaint with your Supervisory Authority. Although we urge you to contact us first to find a solution for any concern you may have, in addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we

process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- *For users in the European Economic Area* – the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en
- *For users in the UK* – the contact information for the UK data protection regulator can be found here: <https://ico.org.uk/make-a-complaint/>

Data Processing outside Europe

Due to the international nature of our business, your personal information may be processed by our service providers, advisers, partners or other recipients of data operating outside Europe who work for us or for third-party service providers or partners. This means that, if you use the Service, your personal information may be provided to recipients in other countries outside Europe.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the European Commission or UK Government (as and where applicable) (from time to time) or under specific adequacy frameworks approved by the European Commission or UK Government (as and where applicable) (from time to time), such as the EU-U.S. Data Privacy Framework or the UK Extension thereto.
- **Transfers to territories without an adequacy decision.**
 - We may transfer your personal information to countries or territories whose laws have **not** been deemed to provide such an adequate level of protection (e.g., the U.S.).
 - However, in these cases:
 - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe – for example, standard-form contracts approved by relevant authorities for this purpose; or
 - in limited circumstances, we may rely on an exception, or ‘derogation’, which permits us to transfer your personal information to such country despite the absence of an ‘adequacy decision’ or ‘appropriate safeguards’ – for example, reliance on your explicit consent to that transfer.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.