

Revision History

Version	Detail of Changes	Changes By	Approval Date	Approved By
1.0	Initial Draft	Bates Group, LLC	06/27/2022	BATES GROUP
2.0	July Update	Ketsal PLLC	08/18/2022	ANSIBLE
3.0	November Update	Ansible Labs, Inc.	11/15/2022	Dan Mottice
4.0	2023 Annual Review & Updates	Ansible Labs, Inc. Bates Group	01/11/2023	Dan Mottice

1.0 Policy Statement

It is the policy of Ansible Labs, Inc. ("Ansible Labs" or "the Company") to inform its users about how it collects, uses, discloses, transmits, and retains their Personally Identifiable Information (PII). The terms used in this Privacy Policy have the same meanings as those in the Ansible Terms of Use, except where otherwise defined in this Privacy Policy. You can access the Ansible Terms of Use here:

<https://ansiblebeam.xyz/legal/#terms-of-use>

2.0 Information Collected

In the table below, you will find a list of categories of PII that Ansible Labs collects, and some examples to help you better understand each category. We have also identified the main sources and purposes for collection. The categories of PII Ansible Labs may collect from you include, but are not limited to:

Categories of PII	Examples	Sources of PII	Purposes for PII Collection
Identifiers	First and last name, email address, physical address, date of birth, telephone number, username and password	Consumer directly (e.g., forms you complete or services you obtain from us) Third party service providers	<ul style="list-style-type: none"> Keep track of the PII associated with your account Satisfying our obligations to you Help you access and restore access to your account Prevent others from accessing your account Send administrative information to you about your account Develop and tune its external marketing campaigns.
Customer Records	Government-issued photo ID, social security number, public wallet address	Consumer directly (e.g., forms you complete or services you obtain from us)	<ul style="list-style-type: none"> Meet our legal and regulatory obligations Permit our financial partners to verify your identity to comply with anti-money laundering laws Permit us and our financial partners to comply with applicable consumer protection laws Provide our services to you

Internet or other electronic network activity information	IP address, computer, or mobile device unique ID number.	Consumer indirectly (e.g. from activity on our websites) Third party service providers	<ul style="list-style-type: none"> ● Analytics ● Advertising and marketing ● To keep our websites safe and secure ● Improve our services
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Ansible Labs offers certain services through third parties with which it is integrated. These service providers may require you to provide them with additional information in order to facilitate your use of their services. Ansible Labs encourages its customers to review the privacy notices of its third-party service providers regarding their treatment of your information. For information regarding Ansible Lab's sharing of the information we have collected on you to other parties, please see Section 3.0 of this Privacy Policy.

3.0 PII Shared with Third Parties

Categories of third parties with whom we share your PII	Why we share your PII	Is PII shared for a business purpose?
Ansible Labs Service Providers	<p>We may share your PII with third-party vendors, consultants, contractors, and other service providers who help us provide the Services to you and who need access to such information to do the work.</p> <p>Specifically, we share your PII with:</p> <ul style="list-style-type: none"> ● Persona for the purpose of conducting KYC screening and identity verification. The Persona Privacy Policy is available at https://withpersona.com/legal/privacy-policy ● ZeroHash for the purpose of providing account management, custodial, and liquidity services. The ZeroHash Privacy Policy is available at https://seedcx.zendesk.com/hc/en-us/articles/360009900494-Privacy-Policy- ● Cross River Bank for the purpose of providing banking services. The Cross River Bank Privacy Policy is available at https://www.crossriver.com/privacy-policy 	Yes
Purchasers of Our Business	<p>We may share or transfer your PII in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. Without your PII, the company that acquires Ansible Labs would not be able to continue to provide the Services to you.</p>	Yes

Law Enforcement	We may share your PII to comply, as necessary, with applicable laws and regulatory requirements, as well as legal process; respond to mandatory legal or governmental requests or demands for information; enforce our agreements, policies, procedures and Terms of Use; and protect ourselves, our customers, or the general public from illegal activities.	No
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4.0 Children's Online Privacy Protection Act Policy

The Children's Online Privacy Protection Act (COPPA) was enacted in 1998 for the specific purpose of protecting children's use of the internet and to assure that children under the age of the 13 do not share their PII without their parents' express approval. COPPA requires the operators of websites to establish controls so that parental consent is obtained and documented prior to the collection of PII for children under the age of 13.

Ansible Labs does not market to children under the age of 13. Ansible Labs requires that an individual be 18 years of age or older before we will offer our services to them.

If Ansible Labs detects any instance where it has obtained the PII of a child under the age of 13, Ansible Labs confirms that it will immediately destroy that information.

5.0 Cookies

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

Ansible Labs' services do not explicitly use "cookies". However, the Site may use third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service. We do not currently respond to "Do Not Track" or DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

Ansible Labs also uses Google Analytics. The following link explains how Google uses data when you use its partners' websites and applications: www.google.com/policies/privacy/partners/. By using our services, you are providing Ansible Labs your express permission to store and access cookies and other information on your computer and to use Google Analytics in connection with such activities. Please read the information at the link provided so you understand what you are agreeing to.

6.0 Retention of Information

Ansible Labs operates to ensure protection of user data and will retain your information for a period of up to five (5) years from the last interaction you have had with us. A "last interaction" means either the date which you last communicated with us (either through phone or email/online support) or the date of your last transaction with us.

Ansible utilizes industry-standard hardware and software controls to protect your information in accordance with U.S. standards and requirements. Use of, and access to, your personal information is restricted to qualified staff members who have a business reason to access it. Ansible stores all U.S. consumer data in U.S. based data centers.

7.0 Third-Party Links

Our Site may contain links to other websites or apps. This Privacy Policy does not apply to your access to and use of the linked websites. Your access and use of the linked websites is governed by the privacy policies of those third-party websites. We are not responsible for the Personal Data practices of such third-party websites. Please review the privacy policies of the third-party websites before you visit them or disclose your Personal Data to them.

8.0 California Consumers

The California Consumer Privacy Act of 2018 (CCPA) grants unique rights to California consumers regarding how businesses treat their PII. It is the policy of Ansible Labs to fully comply with the requirements of the CCPA as they apply to our California consumers.

8.1 Your Rights

If you are a California consumer of Ansible Labs, you are entitled by California law to the following rights:

1. **The Right to Know:** you may request, up to twice in a 12-month period, the following information about the Personal Data we have collected, used, disclosed, or sold about you during the past 12 months:
2.
 - a. the categories and specific pieces of Personal Data we have collected about you;
 - b. the categories of sources from which we collected the Personal Data;
 - c. the business or commercial purpose for which we collected the Personal Data;
 - d. the categories of third parties with whom we shared the Personal Data; and
 - e. the categories of Personal Data about you that we disclosed for a business purpose and sold to third parties, and the categories of third parties to whom the information was disclosed or sold.
3. **The Right to Delete:** you have the right to request that we delete the PII we have collected from you, and instruct our service providers to do the same, within the legal limits set by the CCPA.
4. **The Right to Opt-Out:** you have the right to request that we stop selling your PII.
5. **The Right to Non-Discrimination:** Ansible Labs will not deny you our services, charge you a different price/fee, or provide a different level of service if you decide to exercise your rights under the CCPA. However, if we require your PII to complete a transaction you have requested, and you have decided to delete that information or not provide it to us, we may not be able to complete the transaction you have requested. We will inform you if this is the case.

ANSIBLE LABS DOES NOT SELL YOUR PII TO ANY PARTY

8.2 Exercising Your Rights under the CCPA

If you would like to exercise your CCPA rights, you can contact us at customerservice@ansiblelabs.xyz. We will respond to you as soon as we can, and we will confirm that we have received your email within 10 business days. We will fully respond to your request within 45 calendar days after we have received it.

In order to meet your requests to exercise your CCPA rights, we will need to verify your identity. This process ensures that we don't disclose your PII to criminals or other bad actors. We will require you to submit a copy of your photo ID, and other information as necessary, before we will evaluate your request.

If we decide that we cannot comply with your request, we will inform you of the reasons for this decision, subject to the restrictions of California law and regulation. If we are able to comply with part of your request, we will do so and inform you of the extent to which we have complied to your request.

8.3 Consumer Request by an Authorized Agent

If any authorized agent (such as a lawyer) submits a consumer request under the CCPA on your behalf, we require the authorized agent to submit the following information so that we can confirm their authority to act on your behalf:

- Evidence of authorization to act on behalf of the California consumer: (1) California Secretary of State authorization, (2) notarized written permission from the California consumer, or (3) power of attorney.
- Evidence of identity of the California consumer: (1) first and last name, (2) email address, and (3) account password.

8.4 Requests to Know

PLEASE NOTE: in order to comply with California's regulations, if you submit a request to know, we cannot give you the following information in our reply:

- Social Security Number;
- ID Number (such as your driver's license number or passport number);
- Your password;
- Your security questions/answers, or;
- Any specific or characteristic biometric data we may have collected about you.

We will tell you if we have collected this type of information. For instance, we will say if we have collected your ID number, but we will not send you that information specifically.

8.5 Requests to Delete

If we decide not to delete your information, we will inform you. We can decide not to delete your information because: we cannot verify your identity, or an existing law or regulation prevents us from doing so. We will tell you why we were not able to process your request. If there is any information of yours that we can delete, we will do so. Any information we retain will not be used except for the purposes we describe in our notice to you.

We will maintain records regarding your request to delete your information.

9.0 Policy Changes

We may change this Privacy Policy from time to time to reflect changes about how we collect, use, and share Personal Data. The revised Privacy Policy will become effective as soon as we post it to our Website, or when we notify you through email. If you continue to use our services and access our

Website after we make any changes to this Privacy Policy, then it means that you accept and agree to the changes, so please check this Privacy Policy periodically for updates.

10. Contacting Ansible Labs

If you have questions regarding our privacy policy or how we handle your information, you can contact us at customerservice@ansiblelabs.xyz.