

# Axal Privacy Policy

Effective: January 31, 2025

This Privacy Policy (“Policy”) describes how Lockbox Technologies, Inc. (“Axal,” “we,” “our,” “us”) collects, uses, and discloses certain personal information obtained through our websites (“Sites”), which is located at <https://www.ax.al>, <https://www.getaxal.com>, <https://www.gekkoterminal.ai>, <https://autopilot.getaxal.com>, as well as information that we process as part of offering you our services, including Axal Autopilot (“Autopilot”), which is located at <https://autopilot.getaxal.com> (collectively with the Site, the “Services”). By using our Services, you are agreeing to the terms of this Policy. This Policy is incorporated into, is part of, and is governed by the Axal Terms and Conditions (the “Terms & Conditions”) at <https://getaxal.com/tos>.

## What Information We Collect and Maintain About You

We collect personal and other information from you directly when you provide it to us through the Services. We also automatically collect certain information about you and your computer, smartphone, or other device when you use, access, or interact with our Services.

***Personal information collected from accountholders.*** If you create an account or sign-in with a third-party account in relation to our Services, we will collect information from you related to maintaining your account. This may include your name, email address, digital wallet, and information and preferences related to your portfolio. We may also collect information about you from third parties, such as publicly available sources and data providers, in relation providing you our Services.

***Other personal information collected through the Site.*** You can visit the Site without submitting any information that we can use to identify you personally. However, to use certain features on the Site, such as the “Axal Interest Form” feature, you will be required to provide personal information. Such information could include, for example, your name, email address, and company.

***Web log data.*** When you use the Services, we automatically receive and record certain information from your computer (or other device) and your browser. This may include such data as your IP address and domain name, the pages you visit on the Services sites, the date and time of your visit, the files that you download, the URLs from the websites you visit before and after using the Services, your software and hardware attributes (including device IDs), your general geographic location (e.g., your city, state, or metropolitan region), and certain cookie information (see below). To obtain such information, we may use web logs or applications that recognize your computer and gather information about its online activity.

***Cookies.*** We use cookies on Services webpages. Cookies are small files that are stored on your computer by your web browser. A cookie allows the Services to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of the Services during your current session and over time (including the pages you view and the files you download), your computer’s

operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before visiting the Services webpages, and the link you used to leave the Services. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the Services may not operate correctly.

**Web beacons.** The Services or the emails that you receive from Axal may use an application known as a “web beacon” (also known as a “clear gif” or “web bug”). A web beacon is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to transmit information, which could include personal information. For example, it can allow an email sender to determine whether a user has opened a particular email.

**Third-party online tracking and behavioral advertising.** We may partner with certain third parties to collect, analyze, and use the personal and other information described in this section. For example, we may allow third parties to set cookies or use web beacons on the Site or in email communications from us. This information may be used for a variety of purposes, including online interest-based advertising, as discussed below (see “With Whom and Why We Share Your Information”).

## **How We Use and Process Your Information**

We use the information that we collect (described in “What Information We Collect and Maintain About You,” above) for a variety of purposes, including to:

- Provide you with our Services, fulfill the terms of any agreement you have with us, or otherwise complete a transaction that you initiate;
- Respond to your questions or requests concerning the Services;
- Deliver confirmations, account information, notifications, and similar operational communications;
- Send you information about our Services and other topics that are likely to be of interest to you, including newsletters, security alerts, updates, or other communications, including promotional emails;
- Analyze and benchmark the Services, and for research and product development, including training machine learning models. This helps us improve the Services and your experience using them, as well as to develop new services and features;
- Aggregate and deidentify information;
- Comply with legal and/or regulatory requirements; and
- Manage our business.

We may link information gathered through the Services with information that we collect in other contexts. But in that event, we will handle the combined information in a manner consistent with this Policy.

## **With Whom and Why We Share Your Information**

We may share any of the information described in “What Information We Collect and Maintain About You,” above, with other parties for a variety of purposes, as described below.

***Third-party service providers.*** Axal uses third-party service providers that perform services on our behalf, including web-hosting companies, mailing vendors, crypto wallet, payment and billing services, marketing, and analytics providers. These service providers may collect and/or use your information, including information that identifies you personally, to assist us in achieving the purposes discussed above.

We may share your information with other third parties when necessary to fulfill your requests for services; to complete a transaction that you initiate; to meet the terms of any agreement that you have with us or our partners; or to manage our business.

***Analytics.*** We partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device. In particular, the Services use [Google Analytics](#) to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies by Google Analytics [here](#).

***Do Not Track signals:*** Our Site does not currently respond to “do not track” browser headers.

***Blockchain.*** Since the blockchain is a public record, the transaction records associated with any transactions you make using the Services will be publicly available on the blockchain.

***Legal purposes.*** We may use or share your information with third parties when we believe, in our sole discretion, that doing so is necessary:

- To comply with applicable law or a court order, subpoena, or other legal process;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party;
- To establish, protect, or exercise our legal rights or defend against legal claims; or
- To facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.

***Aggregated and de-identified information.*** Sometimes we aggregate or de-identify information so that it can no longer identify you, as defined under applicable laws. We can use and disclose this aggregated or de-identified information for any purpose, unless an applicable law says otherwise. We will maintain and use such information in deidentified form and not attempt to reidentify the information, except where reidentification is allowed by law for particular purposes.

## **Your Privacy Rights**

If you want to learn more about the personal information that Axal has about you, or you would like to update, change, or delete that information, please contact us by email at [hello@getaxal.com](mailto:hello@getaxal.com).

You may opt out of receiving marketing emails from us by following the instructions in those emails or by emailing us at [hello@getaxal.com](mailto:hello@getaxal.com).

If you are a resident of a jurisdiction with an applicable data privacy law, you may have certain rights available to you in relation to your personal information. These rights may include:

- The right to access your personal information (including a data portability request);
- The right to correct or amend any personal information we have on file about you;
- The right to delete your personal information
- The right to limit the use of your “sensitive” personal information;
- The right to opt-out of the sale or “sharing” of your personal information;
- The right to opt-out of the use of your personal information for targeted advertising purposes;
- The right to restrict or object to the processing of your personal information (such as for direct marketing purposes);
- The right to restrict or opt-out of the use of your personal information for certain automated decision-making (including profiling in furtherance of decisions that produce legal or similarly significant effects);
- The right to revoke your consent (to the extent applicable);
- The right to confirm whether personal information about you is being processed;
- The right to obtain a list of specific third parties (or categories of third parties) to which we have disclosed your personal information or any personal information.

To exercise any of the rights listed above, please contact us via email at [hello@getaxal.com](mailto:hello@getaxal.com).

We will respond to your request as soon as reasonably possible and within the timeframe required under applicable law. We will allow you to appeal any decision we make in response to such request in accordance with applicable law. Appeals may be submitted to [hello@getaxal.com](mailto:hello@getaxal.com) with the subject line “Appeal of Decision Related to Privacy Rights Request.”

Prior to complying with your request, we will first verify your identity by comparing the information you provide with the information we have on file for you.

You may authorize an agent to make a request on your behalf. To designate an agent, please provide a written and signed document by both you and the agent that authorizes the agent to act on your behalf. You may also use a power of attorney. We will still require you to provide

information to allow us to reasonably verify that you are the person about whom we collected personal information.

### **External Links**

This Services may contain links to third-party websites. If you use these links, you will leave the Services. We have not reviewed these third-party sites and do not control and are not responsible for any of these sites, their contents, or their privacy policies. Thus, we do not endorse or make any representations about them, or any information, software, or other products or materials found there, or any results that may be obtained from using them. If you decide to access any of the third-party sites listed on our website, you do so at your own risk.

### **Data Security**

We employ physical, technical, and administrative procedures to safeguard the personal information we collect online. However, no website is 100% secure, and we cannot ensure or warrant the security of any information you transmit to the Services or to us, and you transmit such information at your own risk.

### **Data Retention**

We retain personal information about you necessary to fulfill the purpose for which that information was collected or as required or permitted by law. We do not retain personal information longer than is necessary for us to achieve the purposes for which we collected it. When we destroy your personal information, we do so in a way that prevents that information from being restored or reconstructed.

### **International Users**

The information that we collect through or in connection with the Services is transferred to and processed in the United States for the purposes described above. Axal may subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Services or by providing any personal or other information to us, you expressly consent to such transfer and processing.

### **Children**

Content for the Services is directed at individuals of ages 18 and older and is not directed at children under the age of 13. We do not knowingly collect personally identifiable information from children under the age of 13.

### **Changes to this Policy**

We may make changes to the Services in the future and as a consequence will need to revise this Policy to reflect those changes. We will post all such changes on the Site, so you should review

this page periodically. If we make a material change to the Policy, you will be provided with appropriate notice.

### **How to Contact Us**

Should you have any questions or concerns about this Policy, you can contact us at [hello@getaxal.com](mailto:hello@getaxal.com).