

# **Amulets – Privacy Policy**

#### Introduction

Amulets Labs, LLC ("Amulets," "we," "our," "us") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard information when you use our websites, mobile applications, APIs, products, and services (the "Services"). It is designed to comply with the EU General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other applicable U.S. and international privacy laws.

#### 1. Information We Collect

We may collect and process the following categories of personal data:

- Identity Data: full name, date of birth, government-issued ID, address, nationality.
- Contact Data: email address, phone number, mailing address.
- Financial Data: payment details, wallet addresses, bank account information.
- Transaction Data: records of payments, transfers, deposits, withdrawals, card usage.
- Technical Data: IP address, device information, browser type, operating system, cookies, log files.
- Usage Data: how you interact with our Services, access times, navigation paths.
- Communication Data: customer support inquiries, messages, feedback.
- Marketing & Preference Data: subscription choices, opt-ins, preferences.
- Compliance Data: sanctions screening results, AML/KYC checks, risk scoring.
- Location Data: approximate geolocation, if enabled.



#### 2. How We Use Your Data

We process your data for the following purposes:

- To provide and operate the Services, including account registration and access.
- To process payments, settlements, and transactions.
- To verify your identity, conduct KYC/AML checks, and comply with legal obligations.
- To detect, investigate, and prevent fraud, unauthorized activity, and misuse.
- To provide customer support and respond to requests.
- To communicate important updates, security notices, and policy changes.
- To personalize and improve our Services, conduct analytics, and develop new features.
- To send marketing communications where legally permitted or based on consent.
- To enforce terms of service, defend legal claims, and protect our rights and security.

#### 3. Data Sharing and International Transfers

We may share your personal data with carefully selected third parties, but only when necessary to provide, operate, secure, and improve our Services, or when required by law. These third parties include:

- **Service providers** who support our operations (e.g., KYC/AML, payment processors, credit card networks, loyalty program partners, hosting providers, IT and data analytics firms, mailing and telecom providers).
- Affiliates and group entities of Amulets, subject to confidentiality obligations.
- Professional advisers such as legal, compliance, and audit consultants.
- Marketing and advertising partners, including social media and online platforms, but only with your consent where required.



- Regulators, courts, law enforcement, and tax authorities when disclosure is legally required.
- Authorized representatives or agents that you designate.
- Business transferees or assignees in the event of a merger, acquisition, or restructuring.

We may also share aggregated or anonymized data that cannot identify you, for reporting and service improvement purposes. Your personal data may be transferred and stored in countries outside your state or the European Economic Area (EEA), where data protection laws may differ. In such cases, we will ensure your information remains protected through measures such as:

- Transfers to countries recognized by the European Commission as providing adequate protection;
- Standard Contractual Clauses or equivalent agreements with receiving organizations;
- Security and compliance obligations imposed on our service providers.
- Using our Services, you acknowledge and agree that your data may be transferred internationally, but always under safeguards to maintain confidentiality, integrity, and security in line with this Privacy Policy.

#### 4. Data Retention

We keep your personal data only for as long as needed to provide our Services and to meet legal, regulatory, and contractual obligations. This includes retaining data to comply with laws, resolve disputes, and enforce our agreements. Once no longer required, your data will be securely deleted or anonymized.

amulets

Privacy Policy September 25, 2025 Amulets Labs, LLC.

# **5. Marketing Communications**

We may send you company news, promotions, and information about our products and services — only with your consent (where required). We may also let our affiliates send such messages.

You can opt out anytime by:

- Clicking the unsubscribe link in our emails,
- Sending an email to support@amulets.io with the subject "MARKETING EXIT,"
   or
- Requesting it directly through our official **Telegram support channel**.

Note: You cannot opt out of essential service communications (e.g., security alerts, policy or terms updates, operational notices).

#### 6. Cookies Usage

Amulets may use cookies and similar tracking technologies ("Cookies") to enhance functionality, improve user experience, and support compliance and security measures. Cookies are small data files that may be placed on your browser or device when you access our Services.

We may use Cookies for the following purposes:

- Authentication and Session Management: to recognize returning users, maintain secure sessions, and prevent unauthorized access.
- Customization and Preferences: to remember user settings and improve the usability of the Services.
- Analytics and Performance: to collect aggregated usage data that helps optimize system performance and user experience.



• Compliance and Security: to detect irregular or suspicious activities, support AML/CTF monitoring, and protect account integrity.

Cookies may be session-based (expiring once you close your browser) or persistent (remaining on your device until manually deleted or expired). You may disable Cookies through your browser settings. However, doing so may impair functionality, security, and certain features of the Services. Please note that while some browsers offer "Do Not Track" features, Amulets does not currently respond to such signals.

## 7. Children's Privacy

The Services are not directed at minors under 18. We do not knowingly collect data from children. If discovered, we will delete such data.

#### 8. Third-Party Links

Our Services may contain links to third-party websites. We are not responsible for their privacy practices. We encourage you to review their policies before providing any personal data.

## 9. Information Security

Amulets is committed to safeguarding the confidentiality, integrity, and availability of personal data entrusted to us. We employ a combination of **technical**, **organizational**, **and administrative measures** designed to protect against unauthorized access, alteration, disclosure, or destruction of data.

Our security framework includes, but is not limited to:

• **Encryption:** All sensitive communications are encrypted using industry-standard protocols, and data at rest is subject to encryption controls.



- Access Controls: Access to personal data is strictly limited to authorized personnel and based on role-specific, need-to-know principles. Multi-factor authentication is required for account and system access.
- Monitoring and Detection: Systems are continuously monitored for suspicious activity and vulnerabilities, with intrusion detection and logging mechanisms in place.
- Policy and Governance: We maintain documented security policies, conduct regular reviews of our data collection, storage, and processing practices, and require all staff to undergo security and privacy training.
- Testing and Audits: Security assessments, vulnerability scans, and independent audits are carried out periodically to validate the effectiveness of our controls.
- Incident Response: We maintain a formal incident response plan to promptly detect, contain, and remediate any data breach or attempted intrusion. Where legally required (e.g., GDPR's 72-hour notification rule), we will notify both regulators and affected individuals.

While we apply **commercially accepted security standards** and continuously work to strengthen our defenses, no method of transmission over the Internet or electronic storage can be guaranteed to be fully secure. By using our Services, you acknowledge and understand these inherent risks, while recognizing that Amulets takes all reasonable and proportionate steps to minimize them.

### 10. Contacting Us About Privacy

If you have any questions or concerns regarding this Privacy Policy or the way Amulets handles your personal data, you may reach us at **support@amulets.io** with the subject line "**PRIVACY REQUEST/DATA**."

If you would like to know what personal data we hold about you, or if you wish to request its correction, update, or deletion, please write to us at **privacy@amulets.io** with the subject line "**DATA SUBJECT REQUEST.**" We will make every effort to process



your request promptly. Please note, however, that certain data may need to be retained in order to comply with legal, regulatory, or contractual obligations.

Should you decide to withdraw your consent for the processing of your data, you may also contact us at the same address with the subject "CONSENT WITHDRAWAL." Withdrawal of consent, or failure to provide required information, may limit or prevent us from being able to provide you with our Services.

For the protection of your privacy, Amulets will verify the identity of any individual submitting a data-related request. While we aim to respond without charge, we reserve the right to impose a reasonable fee if a request is manifestly repetitive, excessive, or unfounded.

## 11. Specific Rights Under Different Jurisdictions

# A. Rights of Individuals Under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area ("EEA"), the way Amulets processes your Personal Data depends on the nature of the data and the context of its collection. We may rely on the following lawful bases:

- **Contractual necessity** where the processing of your data is required for us to perform our obligations under a contract with you.
- Consent where you have expressly granted us permission to process your data for specific purposes.
- Legitimate interests where processing is necessary for the pursuit of Amulets' legitimate business or security interests, provided these do not override your rights and freedoms.
- **Legal obligation** where the processing is required to comply with applicable laws and regulatory requirements.



If you reside in the EEA, you are entitled to exercise certain rights over your Personal Data. These include:

- Right of access request a copy of the Personal Data we hold about you.
- **Right to rectification** request correction of inaccurate or incomplete information.
- Right to erasure ("right to be forgotten") request deletion of your Personal
   Data, subject to applicable retention or legal requirements.
- **Right to object** object to our processing of your Personal Data where it is based on legitimate interests.
- **Right to restriction** request that we suspend the processing of your Personal Data under certain circumstances.
- Right to data portability request your Personal Data in a structured, commonly used, machine-readable format, or have it transferred to another service provider.
- **Right to withdraw consent** withdraw your consent at any time, where processing is based on consent.

You may exercise these rights by contacting us as described in **Section 14 (Contacting Us About Privacy Matters)**.

## B. Rights of Residents of California and Certain U.S. States

Residents of California, Colorado, Connecticut, Utah, and Virginia ("Applicable States") are entitled to exercise additional rights under state privacy laws. These rights may include:

 Access – request information regarding the categories and specific pieces of personal information we have collected. Where feasible, we may provide this in a portable format.



- **Correction** request updates or corrections to your information.
- **Deletion** request the deletion of certain information we hold about you, subject to legal or operational exceptions.
- **Opt-in/Opt-out** control the use or disclosure of certain sensitive personal information.
- Authorized agent designate an agent to act on your behalf in exercising these rights. For security reasons, we may request identity verification before processing such requests.

If you wish to exercise any of these rights, or appeal a decision made by Amulets regarding your request, please refer to Section 14 (Contacting Us About Privacy Matters).

#### **Additional Disclosures for California Residents**

- No sale of personal information Amulets does not sell personal information to third parties.
- No discrimination Amulets will not deny services, charge different prices, or provide a lower level of service to individuals exercising their privacy rights.

As required under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), effective January 1, 2023, Amulets makes the following disclosures regarding the categories of personal information collected or disclosed in the preceding twelve months:

Categories of information collected: identifiers (e.g., name, email, phone, IP address), financial information, protected characteristics (e.g., age, gender when voluntarily provided), commercial information (e.g., transaction history), internet/network activity (e.g., log data, interactions), geolocation data,

amulets

Privacy Policy September 25, 2025 Amulets Labs, LLC.

audio/visual/electronic records (e.g., customer service calls), professional or employment-related data, and inference data (e.g., preferences or interests).

- Categories of information disclosed for business purposes: the same categories listed above, limited to what is necessary for compliance, fraud prevention, payment processing, customer support, or service provision.
- Sensitive personal information: Amulets may collect and disclose sensitive
  information (such as identity verification documents or financial account data)
  strictly for purposes permitted under the CCPA/CPRA, including compliance with
  anti-money laundering (AML) and regulatory requirements. Sensitive information
  is not used for profiling, advertising, or any other purpose beyond compliance
  and service provision.

## 12. Contact Us

Amulets Labs, LLC

Email: support@amulets.io

Address: 1111B South Governors Avenue, STE 37811, Dover, DE 19904