

PRIVACY AND COOKIES POLICY

INTRODUCTION

This Privacy and Cookies Policy ("Privacy Policy") governs the collection, processing, use, and disclosure of Personal Data belonging to the customer (collectively "User", "You") by Tangem AG and its affiliates (collectively "Tangem", "we" or "us"). It applies when You interact with our Services as defined below. Tangem AG, a company organized and existing under the laws of Switzerland, with its registered office at Baarerstrasse 10, 6300 Zug, Switzerland, operates the Services.

This Privacy Policy is applicable between You as a user of our Services and us as the operator of the Services. It applies to the use of any Personal Data we collect or that You provide to us in connection with Your use of the Services.

The purpose of this Privacy Policy is to inform You how Your Personal Data is collected, processed, used, and disclosed when You use our Services, in compliance with applicable data protection laws, including the European General Data Protection Regulation ("GDPR") and the California Privacy Rights Act ("CPRA").

We process Your personal data lawfully, fairly, and transparently. We use Your data to provide and improve our Services. By using the Services, You acknowledge that You have read and understood this Privacy Policy.

DEFINITIONS

SERVICES. Means primarily the purchase of Tangem hardware wallets ("Products") through the website located at <https://shop.tangem.com> ("Website"), and related services including accessing information on the website located at <https://tangem.com>, and using our web and mobile applications ("Application") in connection with the Products.

PARTNER SERVICE. Partner Service means a service or feature offered by a third-party partner directly or indirectly to users of the Services, such as payment processing or identity verification.

PERSONAL DATA. Personal Data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes information You provide and information collected automatically.

SENSITIVE PERSONAL INFORMATION. Sensitive Personal Information means Personal Data that reveals a User's social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of mail, email, and text messages unless Tangem is the intended recipient of the communication; genetic data; and the processing of biometric information for the purpose of uniquely identifying a User.

DEVICE INFORMATION. Device Information means technical information about the device You use to access the Services, such as IP address, browser type and version, operating system, device identifiers, and mobile network information.

USAGE DATA. Usage Data means information collected automatically about how You interact with the Services, such as pages visited, time spent on pages, links clicked, features used, and crash reports.

DATA CONTROLLER. Data Controller means the natural or legal person who (alone or jointly with others) determines the purposes and means of the processing of Personal Data. For the purpose of this Privacy Policy, Tangem AG is the Data Controller of your Personal Data.

DATA PROCESSOR (OR SERVICE PROVIDER). Data Processor (or Service Provider under CPRA) means any natural or legal person who processes the data on behalf of the Data Controller. We use various Service Providers to process Your data more effectively.

RESPONSIBLE PERSON / EU REPRESENTATIVE

The Responsible Person for data protection matters at Tangem AG and the designated Representative in the EU according to Article 27 GDPR is Patrick Storchenegger ("Responsible Person").

For any matters relating to data protection, You may contact our data protection team by email at gdpr@tangem.com or by letter to the following address: Baarerstrasse 10, 6300 Zug, Switzerland.

DATA WE COLLECT AND HOW WE USE IT

We collect different types of Personal Data for various purposes to provide and improve our Services to You.

PERSONAL DATA YOU PROVIDE DIRECTLY.

- **Account and Contact Information.** When You register, contact us, subscribe to our newsletter, or download materials, You may provide Your name, email address, and potentially other contact details. Purpose: To create/manage Your account, communicate with You, send newsletters/marketing materials (with Your consent where required), provide support. Legal Basis (GDPR): Contract performance, legitimate interests (communication, marketing), consent.
- **Purchase Information.** When You purchase Products via our Website (powered by Shopify), You provide information necessary to fulfill the order, such as Your name, billing address, shipping address, email address, phone number, and payment information (e.g., credit card details). Purpose: To process Your order, fulfill delivery, process payments, prevent fraud, manage returns/refunds. Legal Basis (GDPR): Contract performance, legal obligation (invoicing, tax), legitimate interests (fraud prevention). Note: Payment details are typically processed directly by our payment processors (see Service Providers).
- **Identity Verification Information.** If You use specific Partner Services accessible through our Application, such as cryptocurrency on-ramp/off-ramp services (e.g., provided by Moonpay), You may be required by that Partner Service to provide identity verification documents (e.g., passport, driver's license) and related information directly to them for Know Your Customer (KYC) and Anti-Money Laundering (AML) purposes. Tangem does not typically collect or store these documents directly for these Partner Services. Purpose: Compliance with legal/regulatory obligations applicable to the Partner Service. Legal Basis (GDPR): Legal obligation (handled by the Partner Service acting as a controller for this purpose).
- **Feedback and Submissions.** If You provide feedback, participate in surveys, or make submissions (e.g., comments). Purpose: To improve our Services, address Your feedback. Legal Basis (GDPR): Legitimate interests (service improvement), consent (where applicable).

PERSONAL DATA COLLECTED AUTOMATICALLY (USAGE DATA & DEVICE INFORMATION).

- **Device Information.** When You use the Website or Application, we automatically collect information like IP address, browser type/version, device type, operating system, unique device identifiers. Purpose: To ensure compatibility, optimize display, maintain security, analyze trends, administer the Services. Legal Basis (GDPR): Legitimate interests (security, service functionality, analytics), contract performance (providing the service).
- **Usage Data.** We collect information about Your interaction with the Services, such as pages visited, features used, time spent, referring URLs, crash logs. Purpose: To understand user behavior, improve user experience, monitor service performance, detect/prevent technical issues, perform statistical analysis. Legal Basis (GDPR): Legitimate interests (service improvement, analytics), consent (for certain tracking technologies).
- **Cookies and Tracking Technologies.** We use cookies, web beacons, pixels, log files, and similar technologies (including from third parties like Google Analytics and Firebase) to collect Usage Data and Device Information, operate the Services, remember Your preferences, personalize content (where applicable), and analyze traffic. See our dedicated "Cookies and Tracking Technologies" section

below. Purpose: Functionality, performance analysis, security, user convenience, marketing (with consent). Legal Basis (GDPR): Legitimate interests (essential cookies), consent (for non-essential cookies like analytics/marketing).

COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies to track the activity on our Services and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier.

- **Types of Cookies:** We use session cookies (temporary) and persistent cookies (remain for a set period or until deleted). We use necessary/essential cookies (required for Services to function), performance/analytics cookies (help us understand usage), functional cookies (remember choices), and potentially marketing/targeting cookies (show relevant ads, used with consent).
- **Specific Technologies:**
 - **Log Files:** Track actions, collect IP, browser type, ISP, referring/exit pages, timestamps.
 - **Web Beacons/Pixels/Tags:** Electronic files to record Browse information.
 - **Google Analytics:** Web analytics service by Google Inc. Tracks website traffic. Data may be used by Google for its network. See Google's Privacy Policy. Opt-out: <https://tools.google.com/dlpage/gaoptout>.
 - **Firebase:** Analytics service for mobile applications by Google Inc. See Google's Privacy Policy. Opt-out via device settings or Google's instructions.
- **Your Choices:** Most browsers allow You to control cookies through settings (refuse all, indicate when sent, delete existing). However, disabling necessary cookies may affect Service functionality. For non-essential cookies (analytics, marketing), we request Your consent via a cookie banner or settings panel where required by law. You can withdraw consent at any time. For information on managing cookies: <http://www.allaboutcookies.org>. By continuing to use necessary cookies or consenting to others, You agree to our use as described.

LEGAL BASIS FOR PROCESSING (GDPR)

We process Your Personal Data based on the following legal grounds under GDPR:

- **Contract Performance:** Processing necessary to fulfill our contractual obligations to You (e.g., processing orders, providing access to Services). (Art. 6(1)(b) GDPR).
- **Legitimate Interests:** Processing necessary for our legitimate interests, provided Your rights and freedoms do not override these interests (e.g., security, fraud prevention, service improvement, analytics, direct marketing to existing customers under certain conditions). (Art. 6(1)(f) GDPR).
- **Consent:** Where You have given clear consent for specific processing activities (e.g., non-essential cookies, subscribing to newsletters). You can withdraw consent at any time. (Art. 6(1)(a) GDPR).
- **Legal Obligation:** Processing necessary to comply with a legal obligation (e.g., tax laws, accounting requirements, responding to legal requests). (Art. 6(1)(c) GDPR).

RETENTION OF DATA

We retain Your Personal Data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and applicable legal requirements (e.g., data related to orders may be kept longer due to tax/commercial law). When no longer needed, Personal Data is securely deleted or anonymized.

TRANSFER OF DATA (INTERNATIONAL TRANSFERS)

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ (e.g., Switzerland, USA).

If You are located in the European Economic Area (EEA), UK, or Switzerland, we ensure that transfers of Your Personal Data outside these regions are adequately protected. We rely on:

- **Adequacy Decisions:** Transfers to countries deemed adequate by the relevant authorities (e.g., Switzerland is deemed adequate by the EU).
- **Standard Contractual Clauses (SCCs):** Implementing appropriate contractual safeguards approved by relevant authorities (e.g., EU Commission SCCs) for transfers to countries without an adequacy decision (like the US), often supplemented by additional technical and organizational measures.
- **Other Legal Mechanisms:** Such as Binding Corporate Rules (BCRs) or derogations under Article 49 GDPR in specific circumstances (though we primarily rely on adequacy or SCCs).

By using the Services, You acknowledge that Your Personal Data may be processed in locations outside Your jurisdiction as described above and in accordance with the safeguards mentioned. Tangem takes all steps reasonably necessary to ensure Your data is treated securely and in accordance with this Privacy Policy.

DATA DISCLOSURE AND SERVICE PROVIDERS

We do not sell or rent Your Personal Data. We may disclose or share Your Personal Data in the following circumstances:

- **Service Providers (Data Processors):** We engage third-party companies and individuals to facilitate our Services, provide Services on our behalf, perform Service-related tasks, or assist us in analyzing how our Services are used. These Service Providers have access to Your Personal Data only to perform these tasks on our behalf and are obligated contractually not to disclose or use it for any other purpose. Categories include:
 - E-commerce Platform Providers (e.g., Shopify, powering our online store)
 - Payment Processors (handle payment information securely)
 - Shipping and Logistics Providers (fulfill Product delivery)
 - Cloud Hosting Providers (store data)
 - Analytics Providers (e.g., Google Analytics, Firebase)
 - Marketing and Communication Providers (e.g., email services for newsletters)
 - Customer Support Platforms
 - Security and Fraud Prevention Services
- **Partner Services:** When You choose to interact with Partner Services (e.g., Moonpay for crypto purchases via our Application), You may share data directly with them. Their use of Your data is governed by their own privacy policies.
- **Legal Requirements:** If required by law or in response to valid requests by public authorities (e.g., a court, government agency).
- **Business Transfers:** If Tangem is involved in a merger, acquisition, or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different privacy policy.
- **Protection of Rights:** To protect and defend the rights or property of Tangem, prevent wrongdoing in connection with the Services, protect the personal safety of users or the public, or protect against legal liability.

We ensure that third parties receiving Personal Data provide adequate protection, often through contractual agreements including data processing agreements and SCCs where applicable.

SECURITY OF DATA

We implement appropriate technical and organizational security measures designed to protect the security of any Personal Data we process. However, despite our safeguards and efforts, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. We cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify Your information. Transmission of Personal Data to and from our Services is at Your own risk. We have procedures to deal with any suspected Personal Data breach and will notify You and any applicable regulator where legally required to do so.

DO NOT TRACK

Most web browsers include a Do Not Track ("DNT") feature or setting You can activate. However, there is no uniform technology standard for recognizing and implementing DNT signals. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates Your choice not to be tracked online.

YOUR DATA PROTECTION RIGHTS

Depending on Your location (especially if You are in the EEA, UK, Switzerland, or California), You have certain data protection rights. Tangem aims to take reasonable steps to allow You to exercise these rights.

- **Right to Access:** Request copies of Your Personal Data.
- **Right to Rectification:** Request correction of inaccurate or incomplete Personal Data.
- **Right to Erasure ('Right to be Forgotten'):** Request deletion of Your Personal Data, under certain conditions.
- **Right to Restrict Processing:** Request restriction of processing Your Personal Data, under certain conditions.
- **Right to Object to Processing:** Object to processing based on legitimate interests or for direct marketing.
- **Right to Data Portability:** Request transfer of Your data to You or another controller in a structured, commonly used, machine-readable format, under certain conditions.
- **Right to Withdraw Consent:** Withdraw consent at any time where processing relies on consent, without affecting prior lawfulness.
- **Right to Lodge a Complaint:** Complain to a supervisory authority (contact details for EU authorities here: https://edpb.europa.eu/about-edpb/board/members_en; for Swiss FDPIC: <https://www.edoeb.admin.ch/edoeb/en/home.html>).

To exercise these rights, please contact us at gdpr@tangem.com. We may need to verify Your identity before responding. We will respond within the timeframes required by applicable law (typically one month under GDPR).

YOUR CALIFORNIA PRIVACY RIGHTS (CPRA)

If You are a California resident, You have specific rights regarding Your Personal Data under the California Privacy Rights Act (CPRA):

- **Right to Know/Access.** You have the right to request disclosure of:
 - Categories of Personal Data we have collected about You.
 - Categories of sources from which the Personal Data is collected.
 - The business or commercial purpose for collecting, selling, or sharing Your Personal Data.
 - Categories of third parties to whom we disclose, sell, or share Personal Data.
 - Specific pieces of Personal Data we have collected about You (generally covering the preceding 12 months, potentially extending back to January 1, 2022, where feasible).
- **Right to Delete.** You have the right to request the deletion of Your Personal Data that we have collected, subject to certain exceptions (e.g., information necessary to complete a transaction, comply with a legal obligation, maintain security). Upon receiving a verifiable request, we will also direct our service providers and contracted third parties to whom we have sold or shared Your Personal Data (if any) to delete it, subject to applicable exceptions.
- **Right to Correct.** You have the right to request the correction of inaccurate Personal Data that we maintain about You. We will use commercially reasonable efforts to correct the data upon verification of Your request.
- **Right to Opt-Out of Sale/Sharing.** You have the right to opt out of the "sale" of Your Personal Data (disclosure to third parties for monetary or other valuable consideration) and the "sharing" of Your Personal Data (disclosure to third parties for cross-context behavioral advertising). You can exercise this right by using mechanisms provided on our website, such as a "Do Not Sell or Share My Personal Information" link or by enabling legally recognized opt-out preference signals (like the Global Privacy Control - GPC) in Your browser, which we are configured to honor.

- **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to limit our use and disclosure of Your Sensitive Personal Information to that which is necessary to perform the Services or provide the goods reasonably expected by an average User, or for other specific purposes permitted by the CPRA (e.g., security, legal compliance). You can exercise this right through mechanisms provided on our website, such as a "Limit the Use of My Sensitive Personal Information" link, or potentially through GPC signals or a unified privacy choices link.
- **Right to Non-Discrimination.** You will not be discriminated against for exercising Your CPRA rights. We will not deny You goods or services, charge different prices, or provide a different level or quality of goods or services based on Your exercise of these rights. We may, however, offer certain financial incentives permitted by the CPRA that can result in different prices, rates, or quality levels, provided the terms are clearly disclosed and require Your opt-in consent before participation.

How to Exercise Your Rights. To submit requests to Know/Access, Delete, or Correct, please contact us by email at gdpr@tangem.com. To exercise Your Right to Opt-Out of Sale/Sharing and Right to Limit Use of Sensitive Personal Information, please use the mechanisms provided on our website (such as preference signals or specific links, as described above where applicable).

We will verify Your request using procedures appropriate to the type of request and the sensitivity of the information requested. This may involve verifying information associated with Your account or previous interactions with us. You may designate an authorized agent to make a request on Your behalf; proof of your written authorization and verification of both your and the agent's identity may be required.

LINKS TO OTHER WEBSITES

Our Services may contain links to other websites not operated by us. If You click a third-party link, You will be directed to that site. We strongly advise You to review the Privacy Policy of every site You visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes to our practices or for other operational, legal, or regulatory reasons. We will notify You of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date. If the changes are material, we may also provide notice through the Services or via email to registered users prior to the change becoming effective. We encourage You to review this Privacy Policy periodically. Your continued use of the Services after changes constitutes Your acceptance of the revised policy.

CONTACT US

If you have any questions about this Privacy Policy or our data practices, please contact us:

By email: gdpr@tangem.com

By mail: Tangem AG. Attn: Data Protection. Baarerstrasse 10 6300 Zug, Switzerland

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