

# Privacy Policy for Neptun.finance

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Welcome to Neptun.finance! This Privacy Policy (“Policy”) outlines the practices of Neptun.finance (“Neptun”, “we”, or “us”) regarding the storage, use, processing, and disclosure of personal data that you choose to share with us when accessing the Platform or using the Services. This Policy, along with our Terms, governs your use of the Platform.

At Neptun, we are committed to safeguarding your personal data and respecting your privacy. We urge you to carefully read this Policy to understand how we handle your personal data. The Policy defines how any personal data collected from you, or provided by you, will be processed.

Unless defined in this Policy, capitalized words have the same meaning ascribed to them in our Terms and Conditions, available at [neptun.finance/public/ToS.pdf](https://neptun.finance/public/ToS.pdf) (“Terms”). Please review this Policy alongside our Terms.

By accessing the Platform, you consent to the collection, storage, use, and disclosure of your personal data, in accordance with and agreeing to be bound by this Policy. We will not collect any information from you unless it is knowingly and explicitly provided by you.

## THE DATA WE COLLECT ABOUT YOU

(a) We may collect, use, store, and transfer different kinds of personal data about you in connection with your use of the Services, including but not limited to: (i) identity data such as username; (ii) contact data such as personal and/or business contact information including your first name, last name, mailing address, telephone number, fax number, e-mail address, or any other personal data you provide to us for the purposes of doing business with us; and (iii) usage data, including how you use the Services.

(b) You are not obligated to provide any personal data or information to us, but by doing so, you may not be able to take advantage of all the Services we offer.

## HOW YOUR PERSONAL DATA IS COLLECTED

We collect and process the following data about you:

- (a) Information you provide: This includes data you consent to share when using our Services or corresponding with us (e.g., via email or chat). It encompasses information shared during registration, data sharing through the Platform, and other activities associated with our Services, including reporting problems.
- (b) Data collected about you and your device: Each time you access our Platform or use our Services, we automatically gather personal data, including technical and usage information. This primarily includes your selected theme.
- (c) Aggregated data: We may collect, use, and share aggregated data, such as statistical information, for various purposes. While aggregated data may be derived from personal data, it is not considered personal data under applicable laws. However, if aggregated data is combined with personal data in a way that can identify you directly or indirectly, we treat it as personal data, subject to this Policy.

## HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

We uphold data protection principles and process personal data only for specified, explicit, and legitimate purposes, for which such data were provided. Primarily, we use your personal data to facilitate your use of Neptun.finance and provide the requested Services. Additionally:

- (a) Consent to sharing: When you consent to providing us with your personal data, you also authorize us to share it with third parties, including government and regulatory entities, as required by law or related to the provision of Services.
- (b) Contact authorization: By using and sharing your information on the Platform, you authorize us, our associate partners, affiliates, and related third parties to contact you via email or the Platform to ensure awareness of all Platform features and Services.
- (c) Data collection and sharing: You acknowledge that any information pertaining to you, whether provided directly or indirectly (e.g., via the Platform), may be collected, compiled, and shared by us to render Services to you, and you expressly consent to this.
- (d) Disclosure of personal data: We generally do not disclose personal data except for specific purposes, including user registration, service delivery, relationship management

(including notifications of changes to Services), administration of Services, troubleshooting, system testing, fulfilling contractual obligations, enforcing agreements, and complying with legal or regulatory obligations.

#### TRANSFER OF PERSONAL DATA

(a) In order to enhance the delivery of our Services to you, the information and personal data you provide may be transferred to and stored in countries outside your home jurisdiction. These countries are governed by their own data laws. We and our service providers may transfer your information to jurisdictions that may not offer the same level of data protection as your home jurisdiction. However, we take measures to ensure your personal data receives adequate protection in these jurisdictions. By using our Services, you expressly consent to this transfer and acknowledge that we are not responsible for any additional terms, conditions, policies, or guidelines.

(b) By submitting your information and personal data to us, you agree to the transfer, storage, and/or processing of such information and personal data outside your home country, as described above.

#### THIRD-PARTY SERVICES

(a) Our Services may include services provided by or links to websites of our partner networks, advertisers, and affiliates (“Third-Party Services”). These Third-Party Services have their own privacy policies, and we do not accept responsibility or liability for them or for any personal data collected through them. Please review their policies before providing any personal data or using their services.

(b) Your relationship with these third parties and their services and tools is independent of your relationship with us. These third parties may allow you to control the information collected. It may be in your interest to individually restrict or enable such data collections.

(c) The processing location of information depends on each third-party service provider, and you should review each service provider's privacy policy to identify the shared data and its purpose. If you opt in to receive communications from third parties, you will be subject to their privacy policy. We are not responsible for the privacy standards and practices of third parties.

## COOKIES

(a) We utilize cookies to distinguish you from other users of the Platform and retain your preferences, enhancing your user experience when utilizing our Services and enabling us to improve the Platform.

(b) Data is collected via 'cookies', small data files sent to your browser from the Platform and stored on your device. These cookies do not grant access to personally identifiable information and enable us to administer the Platform and provide a personalized service. Most web browsers and devices can be configured to notify you when you receive a cookie or to prevent cookies from being sent, although this may limit functionality. Currently, we only collect theme preferences.

(c) Additionally, you may encounter cookies or similar devices on certain Platform pages placed by third parties. We do not control their use of cookies. Correspondence such as emails or letters may also be collected if they pertain to your activities on the Platform.

## DATA SECURITY

(a) We implement reasonable security measures consistent with applicable laws to safeguard your personal information from unauthorized access. However, you acknowledge that these measures do not guarantee absolute protection and agree to assume associated risks.

(b) If you have a password enabling access to our Services, you are responsible for keeping it confidential.

(c) We will comply with applicable laws in the event of a data or security risk.

## DATA RETENTION

Your personal data will be stored and retained for a reasonable period after your use of the Services.

## BUSINESS TRANSITIONS

In the event of a business transition, such as a merger or acquisition, your personal data may be transferred as part of our assets.

## CHANGE IN PRIVACY POLICY

- (a) We regularly review and may amend our Policy at our discretion.
- (b) Any changes will be posted on this page and, where appropriate, notified to you by email. You may be required to read and accept changes to continue using the Services.

## YOUR LEGAL RIGHTS

You have the right to access, update, object to processing, and request erasure of your personal information. To exercise these rights, please contact [info@neptun.finance](mailto:info@neptun.finance) with specific information to confirm your identity.