

# Solana Mobile Saga and dApp Store

## Privacy Policy

Effective as of April 13, 2023.

**California Notice at Collection:** If you are a California resident, see the [California privacy rights section](#) below for important information about your rights under California law.

This Privacy Policy describes how Solana Mobile, Inc. ("**Solana Mobile**," "**we**," "**us**," or "**our**") processes personal information that we collect through our phone ("**Saga**"), our application store ("**dApp Store**"), and wherever this Privacy Policy is linked (the "**Services**").

Solana Mobile may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information. For example, for information about how we process personal information that we collect through our website, please visit: [solanamobile.com/privacy-policy-homepage](https://solanamobile.com/privacy-policy-homepage).

This Privacy Policy does **not** apply to third-party apps made available for download on the dApp Store. We do not control how third-party apps use your personal information. For more information on the privacy practices of third-party app providers, please see their privacy policies. See more in the Other Sites, Services, and Apps section below.

NOTICE TO EUROPEAN USERS: Please see the [Notice to European Users](#) section for additional information for individuals located in the European Economic Area, United Kingdom, or Switzerland (which we refer to as "**Europe**", and "**European**" should be understood accordingly) below.

You can download a printable copy of this Privacy Policy [here](#).

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## Personal information we collect

**Information you provide to us.** Personal information you may provide directly to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, and phone number.
- **Demographic data**, such as your time zone and language when provided to us through the dApp Store.
- **Device information**, including the serial number of your Saga device, and device identifier (e.g., IMEI).
- **Payment and transactional (including blockchain) data**, such as information relating to your orders through the dApp Store, your purchase history on the dApp Store, and your blockchain transaction history.
- **dApp Store interaction history data**, including reviews of apps and other information relating to what content and apps you search for, browse, view, download, and update through the dApp Store.
- **Cryptocurrency-related information**, including wallet information (such as public key, public wallet address, and wallet name (where applicable)) and of Saga non-fungible token (“**NFT**”) holdings.
- **Fingerprint scans** when you unlock your Saga device or authenticate a transaction through the dApp Store.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, social media, or otherwise, including to troubleshoot issues with your Saga device or dApp Store experience or to dispute a transaction on the dApp Store.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Promotion data**, including information or content (such as photos) you share when you enter a competition, promotion or complete a survey. We may offer promotions for NFT giveaways.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as transaction history from public blockchain(s) and

ledgers and other personal information from other publicly available sources.

- **Operating system provider**, such as Google, which provides the Android operating system for the Saga device.
- **Other third parties who you direct to share your personal information with us**, such as your mobile phone service provider who may share data about your mobile account to help us provide you with Saga device-related services.

**Automatic data collection.** We, our service providers, or our business partners (including our hardware providers) may automatically log information about you, your mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Saga device usage data** about your interaction with and use of the Saga device, including information about apps you download; information about app launches and crashes; product interaction (e.g., touch interaction data and how long you use an app); performance and other diagnostic data; and other Saga device usage data.
- **dApp Store usage data** about your interaction with and use of the dApp Store, including when you open and close the dApp Store, your interactions with dApp Store notifications and messages, and information about dApp Store launches and crashes; performance and other diagnostic data; and other usage data.
- **Location data**, including information about nearby Wi-Fi access points and cell towers. If you permit third parties (such as app developers) to collect your location data via the Services, those third parties can process your information according to their privacy policies, see the [Other Sites, Services, and Apps section](#) below.
- **Phone-call related information**, which is collected and processed by your cell phone carrier, such as your mobile network operator, phone number, data about dropped calls and other call or data failures; data about connection to wireless carriers; and customer proprietary network information (CPNI). Your cell phone carrier may use the information in accordance with their own privacy policies.
- **Operating system information**, such as Saga device operating system version. Google provides the Android operating system for the Saga device and may collect and process personal information related to the Services, as described in the Google Privacy Policy at <https://policies.google.com/privacy?hl=en-US>.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise

described at the time of collection:

**Service delivery and operations.** We may use your personal information to:

- provide, operate and improve the Service and our business;
- provide you the content you purchase, download, or want to update in the dApp Store;
- process your transactions through or related to the Services (for example, we may use your personal information to facilitate payment for Saga devices or to process Saga device refund requests);
- identify and authenticate your access to certain features of the Services (for example, we may use your personal information to authenticate your access to your Saga device or transactions through the dApp Store);
- personalizing the service (for example, we may use personal information collected from the camera to dim the brightness of the screen display if you do not appear to be looking at your device);
- enable security features of the Service, such as by sending you security codes via email or SMS;
- communicate with you about the Service, including by sending Service-related announcements (such as messages about new content and offers on the dApp Store), updates, security alerts, and support and administrative messages;
- communicate with you about events or contests in which you participate;
- understand your needs and interests; and
- provide support for the Service, such as debugging and repairing errors, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. As part of these activities,

**To create aggregated, de-identified and/or anonymized data.** We may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties, including app developers, for our lawful business purposes, including to analyze and improve the Service and promote our business. We will not attempt to reidentify any such data, except as permitted by law.

**Marketing.** We and our service providers may collect and use your personal information for marketing purposes. For example, we may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

**Events, promotions and contests.** We may use your personal information to:

- administer promotions and contests
- communicate with you about promotions or contests in which you participate
- contact or market to you after collecting your personal information at an event

**Service improvement and analytics.** We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which apps are most and least visited and how those apps perform, and to develop new products and services.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## **How we share your personal information**

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

**Affiliates.** Our corporate parent, subsidiaries, and affiliates.

**Service providers.** Third parties that provide services on our behalf or help us

operate the Service or our business (such as processing or hosting, including personal information, information technology, customer service and support, email delivery, marketing, consumer research and analytics).

**Partners.** Our partners and to enable partners to collect information directly via our Service. For example, we may share your personal information about app crashes and errors, including device operating system version, device type, and crash logs with our partners for the purpose of identifying and fixing technical issues within the app.

**Operating system provider.** For example, we may share information about what software is currently running on your Saga device for the operating system provider to check if software updates are available.

**App developers.** Third-party app developers who make their app available in the dApp Store and who develop dApps. We may share your personal information (such as information to prove a dApp Store purchase) with app developers so they can provide your purchased content to you.

**Business partners.** Third parties with whom we co-sponsor events or promotions, and with whom we jointly offer products or services.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

**Business transferees.** We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Solana Mobile, financing of Solana Mobile, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Solana Mobile as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

**Other users and the public.** Certain of your personal information may be visible to other users of the Service and the public. For example, members of the public may have access to information published on the blockchain through the Service, such as when we issue you an NFT. As another example, other users of the dApp Store and the public can view your reviews of apps that you submit to the dApp Store. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others, and we are not responsible for any such use of this information.

**With your consent.** We may share your personal information with others at your direction or with your consent.

## Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California, and Europe can find additional information about their rights below.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Privacy settings.** We make available certain privacy settings on the Service, including options to control the collection of information we and/or our partners use to improve our Services (on your Saga device, go to Settings > Solana Mobile > Improve our services) and to control the collection of telemetry and crash data by accessing and adjusting your settings (on your Saga device, go to Settings > Privacy > Usage & Diagnostics > Turn off Usage & Diagnostics).

## Other sites, services, and apps

The Service may contain links to websites, mobile applications, and other online services operated by third parties. For example, you can download apps from third-party app developers through the dApp Store. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile apps or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile apps and online services you use.

## Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in Europe should read the important information provided below about transfer of personal information outside of Europe.

## Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or by other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

## How to contact us

- **Email:** [privacy@solanamobile.com](mailto:privacy@solanamobile.com)
- **Mail:** 530 Divisadero St. PMB 722 San Francisco, CA 94117

## California privacy rights notice

This section describes how we collect, use, and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, “CPRA”) and the rights these users may have with respect to their Personal Information. Please note that **we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.**

For purposes of this section, the term “**Personal Information**” has the meaning given in the CPRA and does not include information exempted from the scope of the CPRA. This section does not apply to our collection, use, and sharing of Personal Information of our job applicants and employees.

**Your California privacy rights.** California residents have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Information. You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - o The categories of Personal Information that we have collected.
  - o The categories of sources from which we collected Personal Information.
  - o The business or commercial purpose for collecting and/or selling Personal Information.
  - o The categories of third parties with which we share Personal Information.
  - o The categories of Personal Information that we sold or disclosed for a business purpose.
  - o The categories of third parties to whom the Personal Information was



sold or disclosed for a business purpose.

- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out.** Although you may have a right to opt out of certain processing of your personal information for targeted advertising purposes, profiling/automated decision making, or the other sales of personal information, we have not engaged in such activities in the past 12 months.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CPRA.

**Exercising your right to information, access, correction, and deletion.** You may submit requests to exercise your right to information, access, correction, or deletion by calling us toll free at 1 (888) 212-2019 or via email to [privacy@solanamobile.com](mailto:privacy@solanamobile.com).

**Verification of Identity; Authorized agents.** We may need to verify your identity in order to process your information, access, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CPRA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

**No selling or sharing of personal information.** We have not sold or shared your personal information in the preceding 12 months.

**Personal information that we collect, use and disclose.** We have summarized the Personal Information we collect by reference below to both the categories defined in the "Personal information we collect" section of this Policy above and the categories of Personal Information specified in the CPRA (Cal. Civ. Code §1798.140) and to describe our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

<b>Personal</b>	<b>CCPA</b>	<b>Business/</b>	<b>Categories of third</b>
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<b>Information (“PI”) we collect</b>	<b>statutory category</b>	<b>commercial purpose for PI collection</b>	<b>parties to whom we “disclose” PI for a business purpose</b>
<ul style="list-style-type: none"> <li>● <i>Contact data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>California consumer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of third parties</i>
<ul style="list-style-type: none"> <li>● <i>Demographic data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>California customer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of third parties</i>
<ul style="list-style-type: none"> <li>● <i>Device serial number data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>Commercial information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> </ul>	<i>All categories of third parties</i>

	<ul style="list-style-type: none"> <li>● <i>California customer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	
<ul style="list-style-type: none"> <li>● <i>dApp Store interaction history data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>Commercial information</i></li> <li>● <i>California customer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of third parties</i>
<ul style="list-style-type: none"> <li>● <i>Payment and transactional (including blockchain) data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Commercial information</i></li> <li>● <i>California consumer records</i></li> <li>● <i>Financial information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of third parties</i>
<ul style="list-style-type: none"> <li>● <i>Cryptocurrency-related information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Commercial information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> </ul>	<i>All categories of third parties</i>

	<ul style="list-style-type: none"> <li>● <i>n</i></li> <li>● <i>California consumer records</i></li> <li>● <i>Financial information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	
<ul style="list-style-type: none"> <li>● <i>Fingerprint scans</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Biometric information</i></li> <li>● <i>Sensor information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of the third parties, except cell phone carriers, business partners and other users and the public</i>
<ul style="list-style-type: none"> <li>● <i>Communications data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>Commercial information</i></li> <li>● <i>California consumer records</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of the third parties</i>
<ul style="list-style-type: none"> <li>● <i>Marketing</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and</i></li> </ul>	<i>All categories of the third parties, except service</i>

<p><i>g data</i></p>	<p><i>fiers</i></p> <ul style="list-style-type: none"> <li>● <i>Com mercial informatio n</i></li> <li>● <i>Califo rnia customer records</i></li> <li>● <i>Intern et or Network Informatio n</i></li> </ul>	<p><i>operations</i></p> <ul style="list-style-type: none"> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<p><i>providers, partners, cell phone carriers, business partners, and other developers and the public</i></p>
<ul style="list-style-type: none"> <li>● <i>Promotio n data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identi fiers</i></li> <li>● <i>Com mercial informatio n</i></li> <li>● <i>Califo rnia customer records</i></li> <li>● <i>Intern et or Network Informatio n</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<p><i>All categories of the third parties, except service providers, partners, cell phone carriers, business partners, and other users and the public</i></p>
<ul style="list-style-type: none"> <li>● <i>Phone- call related information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identi fiers</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Service improvement and analytics</i></li> </ul>	<p><i>All categories of the third parties</i></p>

		<ul style="list-style-type: none"> <li>● <i>Compliance &amp; protection</i></li> </ul>	
<ul style="list-style-type: none"> <li>● <i>Saga device usage data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers (other)</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of the third parties</i>
<ul style="list-style-type: none"> <li>● <i>dApp Store usage data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers (other)</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of the third parties</i>
<ul style="list-style-type: none"> <li>● <i>Device information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<i>All categories of the third parties</i>

<ul style="list-style-type: none"> <li>● <i>Data derived from the above</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Inferences</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery and operations</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing</i></li> <li>● <i>Events, promotions, and contests</i></li> <li>● <i>Service improvement and analytics</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<p><i>All categories of the third parties, except service providers, partners, cell phone carriers, and other users and the public</i></p>
<ul style="list-style-type: none"> <li>● <i>Other Sensitive Personal Information</i></li> </ul> <p><i>We do not intentionally collect this information, but it may be revealed in identity data or other information we collect</i></p>	<ul style="list-style-type: none"> <li>● <i>Protected Classification Characteristics</i></li> </ul>	<p>N/A</p>	

**Additional information for Nevada residents.** Nevada residents have the right to opt-out of the sale of certain personal information for monetary consideration. While we do not currently engage in such sales, if you are a Nevada resident and would like to make a request to opt out of any potential future sales, please email [privacy@solanamobile.com](mailto:privacy@solanamobile.com).

# Notice to European users

## General

- **Where this Notice to European users applies.** The information provided in this “Notice to European users” section applies only to individuals in the United Kingdom and the European Economic Area (i.e., “**Europe**” as defined at the top of this Privacy Policy).
- **Personal information.** References to “personal information” in this Privacy Policy should be understood to include a reference to “personal data” governed by European data protection legislation, including the “**GDPR**” (i.e., the General Data Protection Regulation 2016/679 (“**EU GDPR**”) and the EU GDPR as it forms part of UK law (“**UK GDPR**”) – i.e., information about individuals from which they are either directly identified or can be identified.
- **Controller.** Solana Mobile is the controller in respect of the processing of your personal information covered by this Privacy Policy for the purposes of the GDPR. See the ‘How to contact us’ section above for our contact details.
- **Our GDPR Representative.** We have appointed the following representative in Europe as required by the GDPR – you can also contact them directly should you wish:

*Our Representative in the EU and UK.* Our EU representative appointed under the EU GDPR and the UK GDPR is Data Protection Representative Limited (also known as DataRep). You can contact them:

- By email to: [datarequest@datarep.com](mailto:datarequest@datarep.com) quoting <Solana Mobile Inc.> in the subject line
- contacting us on our online webform at [www.datarep.com/data-request](http://www.datarep.com/data-request)
- By postal mail to the most convenient of the addresses below:

Please post your requests addressed to ‘DataRep’ and not Solana Mobile directly; communications addressed directly to Solana Mobile will likely not be received.

Country	Address
<b>Austria</b>	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
<b>Belgium</b>	DataRep, Place de L'Université 16, Louvain-La-Neuve, Waals Brabant, 1348, Belgium
<b>Bulgaria</b>	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
<b>Croatia</b>	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
<b>Cyprus</b>	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol,



	3030, Cyprus
<b>Czech Republic</b>	DataRep, IQ Ostrava Ground floor, 28. října 3346/91, Ostrava-mesto, Moravska, Ostrava, Czech Republic
<b>Denmark</b>	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
<b>Estonia</b>	DataRep, 2 <sup>nd</sup> Floor, Tornimäe 5, Tallinn, 10145, Estonia
<b>Finland</b>	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
<b>France</b>	DataRep, 72 rue de Lessard, Rouen, 76100, France
<b>Germany</b>	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
<b>Greece</b>	DataRep, 24 Lagoumitzi str, Athens, 17671, Greece
<b>Hungary</b>	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
<b>Iceland</b>	DataRep, Kalkofnsvegur 2, 3 <sup>rd</sup> Floor, 101 Reykjavík, Iceland
<b>Ireland</b>	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
<b>Italy</b>	DataRep, Viale Giorgio Ribotta 11, Piano 1, Rome, Lazio, 00144, Italy
<b>Latvia</b>	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
<b>Liechtenstein</b>	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
<b>Lithuania</b>	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
<b>Luxembourg</b>	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
<b>Malta</b>	DataRep, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
<b>Netherlands</b>	DataRep, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
<b>Norway</b>	DataRep, C.J. Hambros Plass 2c, Oslo, 0164, Norway
<b>Poland</b>	DataRep, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
<b>Portugal</b>	DataRep, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
<b>Romania</b>	DataRep, 15 Piața Charles de Gaulle, nr. 1-T, București, Sectorul 1, 011857, Romania
<b>Slovakia</b>	DataRep, Apollo Business Centre II, Block E / 9th floor, 4D Prievozska, Bratislava, 821 09, Slovakia
<b>Slovenia</b>	DataRep, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
<b>Spain</b>	DataRep, Calle de Manzanares 4, Madrid, 28005, Spain
<b>Sweden</b>	DataRep, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden
<b>United Kingdom</b>	DataRep, 107-111 Fleet Street, London, EC4A 2AB, United Kingdom

## Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to perform a contract, we are about to enter into or have

entered into with you (“**Contractual Necessity**”).

- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see ‘How we use your personal information’

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data</li> <li>● Device serial number data</li> <li>● Payment and transactional (including blockchain) data</li> <li>● Cryptocurrency-related information</li> <li>● Phone-call related information</li> </ul>	<ul style="list-style-type: none"> <li>● Contractual Necessity</li> </ul>
	<ul style="list-style-type: none"> <li>● Fingerprint scan</li> <li>● Location data</li> </ul>	<ul style="list-style-type: none"> <li>● Consent</li> </ul>
	<ul style="list-style-type: none"> <li>● dApp Store interaction</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate Interests. We have a legitimate interest in offering you a</li> </ul>

Purpose	Categories of personal information involved	Legal basis
	history data ● dApp Store usage data ● Communications data	good service, including by allowing you to interact with the Services and by communicating with you where you have contacted us.
	● Saga device usage data	● Legitimate Interests. We have a legitimate interest in ensuring the ongoing security and proper operation of our Service and associated IT services, systems, and networks.
Research and development	● Contact data ● Demographic data ● Device serial number data ● Cryptocurrency-related information ● Phone-call related information ● Communications data ● Saga device usage data ● dApp Store interaction history data ● Location data	● Legitimate Interests. We have a legitimate interest in providing you with a good service, which is personalised to you and that remembers your selections and preferences. ●
	● Any and all data types relevant in the circumstances	● Legitimate Interests. We may aggregate, de-identify or otherwise anonymize data for research and development purposes. We have a legitimate interest in analyzing the use of our Services on an aggregated,

Purpose	Categories of personal information involved	Legal basis
		de-identified or otherwise anonymized basis.
Marketing	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data,</li> <li>● Registration data</li> <li>● Payment and transactional (including blockchain) data</li> <li>● Marketing data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organisation and sending marketing communications for that purpose.</li> <li>● Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.</li> </ul>
Events, promotions and contests	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data</li> <li>● Device serial number data</li> <li>● Marketing data</li> <li>● Promotion data</li> </ul>	<ul style="list-style-type: none"> <li>● Contractual Necessity to administer the promotions and contests in accordance with the terms or rules thereof (including communicating with you as and where necessary)</li> <li>● In respect of promoting these promotions and contests: <ul style="list-style-type: none"> <li>● Legitimate Interests - we have a legitimate interest in promoting these promotions and contests, including associated publicising of our business and operations.</li> <li>● Consent - in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given promotional communications.</li> </ul> </li> </ul>
Service improvement and analytics	<ul style="list-style-type: none"> <li>● Demographic data</li> <li>● Saga device usage data</li> <li>● dApp Store interaction</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate Interests. We have a legitimate interest in offering you a good service, including by improving our Services based on how you use our Services.</li> <li>● Consent</li> </ul>

Purpose	Categories of personal information involved	Legal basis
	history data ● Location data	
Compliance and protection	● Any and all data types relevant in the circumstances	● Compliance with Law ● Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.
Further uses	● Any and all data types relevant in the circumstances	● The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected.  ● Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

**Retention**

We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information, we have collected about you,

we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

### **Other info**

**No sensitive personal information.** If you provide any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.

**No Automated Decision-Making and Profiling.** As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects.

### **Your rights**

General. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests - you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

- **Exercising These Rights.** You may submit these requests by email to [privacy@solanamobile.com](mailto:privacy@solanamobile.com) or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.
  
- **Your Right to Lodge a Complaint with your Supervisory Authority.** In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.
  - **For users in the European Economic Area** - the contact information for the data protection regulator in your place of residence can be found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)
  - **For users in the UK** - the contact information for the UK data protection regulator is below:

The Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 303 123 1113  
Website: <https://ico.org.uk/make-a-complaint/>

### **Data Processing outside Europe**

We may share your personal information with third parties who may be based outside of the EEA and/or UK. In such circumstances, those parties' processing of your personal information will involve a transfer of your personal information outside of the EEA and/or UK where privacy laws may not be as protective as those in your state, province, or country.

You can obtain further information or a copy of or access safeguards under which your personal information is transferred outside of the EEA and/or UK by contacting us at [privacy@solanamobile.com](mailto:privacy@solanamobile.com).