

Global Privacy Policy

Last Updated: 25 August 2025

We value and respect your privacy. We are committed to keeping secure any information we obtain from you or about you. This Privacy Policy describes our practices with respect to information we collect from or about you when you use our website, platform, and applications (collectively “**Services**”).

Personal information we collect

We collect personal information relating to you (“**Personal Information**”) if you communicate with us (including signing up for a mailing list) or otherwise use our Services.

- *Account Information:* When you create an account with us, we may collect your name, email address, and any other information you provide to us for the purpose of creating and maintaining your account and profile.
- *Communication Information:* If you communicate with us, including signing up for a mailing list or newsletter, we may collect your name, contact information, and the contents of any messages you send (“**Communication Information**”).
- *Social Media Information:* We have pages on Third Party Sites like Truth Social, X (formerly Twitter), and LinkedIn. When you interact with our social media pages, we will collect Personal Information that you elect to provide to us, such as your contact information. In addition, the companies that host our social media pages may provide us with aggregate information and analytics about our social media activity (collectively “**Social Information**”). See further details below in the “Links to other websites” section.
- *Other Information You Provide:* We collect other information that you may provide to us, such as when you participate in our events or surveys (collectively “**Other Information You Provide**”).

Personal Information We Receive Automatically From Your Use of the Services:

When you visit, use, or interact with the Services, in addition to the Personal Information described above, we also receive the following information about your visit, use, or interactions (“**Technical Information**”):

Log Data: Information that your browser or device automatically sends when you use our Services. Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, location data, and how you interact with our Services.

Usage Data: We may collect information about your use of the Services, such as the features you use and the actions you take, as well as your time zone, country, the dates and times of access, user agent and version, type of computer or mobile device, and your computer connection.

Device Information: Includes name of the device, operating system, device identifiers, and browser you are using. Information collected may depend on the type of device you use and its settings.

Cookies: A “cookie” is a piece of information sent to your browser by a website you visit. You can set your browser to accept all cookies, to reject all cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. However, refusing a cookie may in some cases preclude you from using, or negatively affect the display or function of, a website or certain areas or features of a website. For more details on cookies, please visit [All About Cookies](#).

Third-party cookies are cookies from a domain different from the domain of the website you are visiting. Similar technologies, such as pixels, web beacons, or local storage, can also be used for these purposes. We use the term “cookies” to refer to cookies and such other similar technologies.

Our Services use limited third-party cookies (those from other web technology companies separate from us). They allow us to authenticate users or enable specific features within the Services. These include:

- *Analytics:* We may use a variety of online analytics products that use cookies to help us analyze how users use our Services and enhance your experience when you use the Services.

How we use personal information

We may use Technical Information and Personal Information for the following purposes:

- To provide, administer, maintain and/or analyze the Services;
- To improve our Services;
- To communicate with you; including to send you information about our Services and events;
- To develop new programs and services;
- To prevent fraud, criminal activity, or misuses of our Services, and to protect the security of our IT systems, architecture, and networks;
- To carry out business transfers; and
- To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.

Aggregated or De-Identified Information

We may aggregate or de-identify Personal Information so that it may no longer be used to identify you and use such information to analyze the effectiveness of our Services, to improve and add features to our Services, to conduct research, and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Services and share aggregated information like general user statistics with third parties, publish such aggregated information, or make such aggregated information generally available. We may collect aggregated information through the Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use de-identified information in anonymous or de-identified form and we will not attempt to reidentify the information, unless required by law.

Disclosure of personal information

In certain circumstances we may provide your Personal Information to third parties without further notice to you, unless notice is required by the law:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may provide Personal Information to vendors and service providers, including providers of hosting services, customer service vendors, cloud services, email communication software, web analytics services, and other information technology providers, among others. Pursuant to our instructions, these parties will access, process, or store Personal Information only in the course of performing their duties to us.
- **Business Transfers:** If we are involved in strategic transactions, reorganization, bankruptcy, receivership, or transition of service to another provider (collectively a “**Transaction**”), your Personal Information and other information may be disclosed in the diligence process with counterparties and others assisting with the Transaction and transferred to a successor or affiliate as part of that Transaction along with other assets.
- **Legal Requirements:** We may share your Personal Information, including information about your interaction with our Services, with government authorities, industry peers, or other third parties (i) if required to do so by law or in the good faith belief that such action is necessary to comply with a legal obligation, (ii) to protect and defend our rights or property, (iii) if we determine, in our sole discretion, that there is a violation of our terms, policies, or the law; (iv) to protect the safety, security, and integrity of our products, employees, or users, or the public, or (v) to protect against legal liability.

Your rights

Depending on location, individuals may have certain statutory rights in relation to their Personal Information. For example, you may have the right to:

- Access your Personal Information and information relating to how it is processed.
- Delete your Personal Information from our records.
- Rectify or update your Personal Information.
- Transfer your Personal Information to a third party (right to data portability).
- Restrict how we process your Personal Information.
- Withdraw your consent—where we rely on consent as the legal basis for processing at any time.
- Object to how we process your Personal Information.
- Lodge a complaint with your local data protection authority.

Please submit your request to exercise any of your rights, including any request to access or delete your Personal Information, via (1) email to: **212@MCGA.com** or (2) certified mail to: **Crypto.com Strategy Holdings, 110 N. College Ave., Ste. 500, Tyler, TX 75702.**

Additional U.S. state disclosures

The following provides additional information about the categories of Personal Information we collect and how we disclose that information. You can read more about the Personal Information we collect in “Personal information we collect” above, how we use Personal Information in “How we use personal information” above, and how we retain Personal Information in “Security and Retention” below.

Identifiers, such as your name, contact details, IP address, and other device identifiers

We may disclose this information to our affiliates, vendors, and service providers to process in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; to parties involved in Transactions; to corporate administrators of accounts; and to other third parties you choose to share it with.

Commercial Information, such as your transaction history with us

We may disclose this information to our affiliates, vendors, and service providers to process in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; to parties involved in Transactions; and to corporate administrators of accounts.

Network Activity Information and how you interact with our Services

We may disclose this information to our affiliates, vendors, and service providers to process in accordance with our instructions; to law enforcement and other third parties for the legal reasons

described above; to parties involved in Transactions; and to other third parties you choose to share it with.

Geolocation Data

We may disclose this information to our affiliates, vendors and service providers to process in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; and to parties involved in Transactions.

To the extent provided for by local law and subject to applicable exceptions, individuals may have the following privacy rights in relation to their Personal Information:

- The right to know information about our processing of your Personal Information, including the specific pieces of Personal Information that we have collected from you;
- The right to request deletion of your Personal Information;
- The right to correct your Personal Information; and
- The right to be free from discrimination relating to the exercise of any of your privacy rights.

We don't sell or share Personal Information for the purposes of inferring characteristics about a user (as those terms are defined under applicable local law).

Exercising Your Rights

To the extent applicable under local law, you can exercise privacy rights described in this section by submitting a request via (1) email to: **212@MCGA.com** or (2) certified mail to: **Crypto.com Strategy Holdings, 110 N. College Ave., Ste. 500, Tyler, TX 75702.**

Verification

In order to protect your Personal Information from unauthorized access, change, or deletion, we may require you to verify your credentials before you can submit a request to know, correct, or delete Personal Information. If you do not have an account with us, or if we suspect fraudulent or malicious activity, we may ask you to provide additional Personal Information and proof of residency for verification. If we cannot verify your identity, we will not be able to honor your request.

Appeals

Depending on where you live, you may have the right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please send

your request via certified mail to: **Crypto.com Strategy Holdings, 110 N. College Ave., Ste. 500, Tyler, TX 75702.**

Children

The Services are not available to persons under 16 years of age. If you are under 18 you must have your parent or legal guardian's permission to use our Services.

Links to other websites

The Service may contain links or otherwise provide access to, or means to share information with, other websites or services not operated or controlled by us including social media services ("**Third-Party Sites**"). The information that you share with Third-Party Sites will be governed by the specific privacy policies and terms of service of the Third-Party Sites and not by this Privacy Policy. By providing such links or access we do not imply that we endorse or have reviewed these sites. Please contact the Third-Party Sites directly for information on their privacy practices and policies.

Security and Retention

We implement commercially reasonable technical, administrative, and physical measures to protect Personal Information both online and offline from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or electronic transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us via the Service or other means of electronic transmission. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service or Third-Party Sites.

We'll retain your Personal Information for only as long as we need in order to provide our Service to you, or for other legitimate business purposes such as resolving disputes, safety and security reasons, or complying with our legal obligations. How long we retain Personal Information will depend on a number of factors, such as the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, our purpose for processing the information, and any legal requirements.

International Users (except for the European Economic Area, United Kingdom and Switzerland)

By using our Service, you understand and acknowledge that your Personal Information will be processed in our facilities and servers in the U.S. and may be disclosed to our service providers and affiliates in other jurisdictions.

Legal Basis for Processing

Our legal bases for processing your Personal Information include:

- Performance of a contract with you in the course of providing and maintaining our Services. When we process Account Information and Technical Information solely to provide our Services to you, this information is necessary to be able to provide our Services. If you do not provide this information, we cannot provide our Services to you.
- Our legitimate interests in protecting our Services from abuse, fraud, or security risks. This may include the processing of Account Information, Social Media Information, and Technical Information.
- Your consent when we ask for your consent to process your Personal Information for a specific purpose that we communicate to you. You have the right to withdraw your consent for such processing at any time.
- Compliance with our legal obligations when we use your Personal Information to comply with applicable law or when we protect our or our affiliates', users', or third parties' rights, safety, and property.

Users in the European Economic Area, United Kingdom and Switzerland

You have the following statutory rights in relation to your Personal Data (as defined under applicable law):

- Access your Personal Data and information relating to how it is processed.
- Delete your Personal Data from our records.
- Rectify or update your Personal Data.
- Transfer your Personal Data to a third party (right to data portability).
- Restrict how we process your Personal Data.
- Withdraw your consent—where we rely on consent as the legal basis for processing at any time.
- Lodge a complaint with your local data protection authority (see below).

You have the following rights to object:

- Object to our processing of your Personal Data for direct marketing at any time.
- Object to how we process your Personal Data when our processing is based on our legitimate interests.

You can exercise these rights by submitting your request via (1) email to: **212@MCGA.com** or (2) certified mail to: **Crypto.com Strategy Holdings, 110 N. College Ave., Ste. 500, Tyler, TX 75702.**

Please note these rights may be limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information that we are required by law or have compelling legitimate interests to keep.

We hope that we are able to address any questions or concerns you may have. If you have any unresolved complaints, you can contact your local supervisory authority. For any unresolved complaints relating to the UK you can reach out to the Information Commissioner's Office, and for Switzerland, to the Federal Data Protection and Information Commissioner.

Data Transfers

We will transfer your Personal Data to recipients outside of the EEA, Switzerland, and the UK for the purposes described in this Privacy Policy. If you are based in the EEA, Switzerland, or the UK and your Personal Data is transferred to a third country, that third country may not offer the same level of data protection as your home country.

By using our Services, you understand and acknowledge that your Personal Data will be processed by servers in the U.S. and may be disclosed to our service providers and affiliates in other jurisdictions.

Legal bases for processing

When we process your Personal Data for the purposes described above, we rely on the following legal bases:

To provide and maintain our Services:

Where necessary to perform a contract with you, such as processing your requests and otherwise to provide the Services to you.

To improve and develop our Services and new features:

Where necessary for our legitimate interests and those of third parties and broader society, including in developing, improving, or promoting our Services.

To communicate with you, including to send you information or marketing about our Services and events:

Where necessary to perform a contract with you, such as processing your contact information to send you a technical announcement about the Services. Your consent when we ask for it to process your Personal Data for a specific purpose that we communicate to you, such as processing your contact information to send you certain forms of marketing communications.

To prevent fraud, criminal activity, or misuses of our Services, and to protect the security of our systems and Services:

Where necessary to comply with a legal obligation. Where we are not under a specific legal obligation, where necessary for our legitimate interests and those of third parties, including in protecting our Services from abuse, fraud, or security risks, such as processing data from security partners to protect against fraud, abuse and security threats in our Services.

To comply with legal obligations and to protect the rights, privacy, safety, or property of our users, us, our affiliates, or any third party:

Where necessary to comply with a legal obligation, such as retaining transaction information to comply with record-keeping obligations. Where we are not under a specific legal obligation, where necessary for our legitimate interests and those of third parties and broader society, including in protecting our or our affiliates', users', or third parties' rights, safety, and property, such as analyzing log data to identify fraud and abuse in our Services.

Changes to this Privacy Policy

We are continuously working to develop and improve our Services. We may update this Privacy Policy or our Services from time to time. If we do, we will give you at least the minimum amount of advance notice required by applicable law of changes that materially impact you either via email or an in-product notification. All other changes will be effective as soon as we publish them to our website or within the Services. If you do not agree to any changes, you must immediately stop using our Services.

How to contact us

Please contact us via (1) email to: **212@MCGA.com** or (2) certified mail to: **Crypto.com Strategy Holdings, 110 N. College Ave., Ste. 500, Tyler, TX 75702** if you have any questions or concerns not already addressed in this Privacy Policy.