# Fluent Connect Privacy Policy

**Last Modified:** December 10, 2025

Fluent Labs, Inc. (**"Project**," **"its**") provides this Privacy Policy to explain Project's practices regarding the collection, use, and disclosure of your personal information both online and offline. This Privacy Policy applies to the https://www.fluent.xyz/ website (**"Website"**) and any websites, apps, or services that link to this Privacy Policy (**"Services"**), unless otherwise indicated. Your use of the Services is subject to this Privacy Policy as well as the Terms of Use.

The purpose of this Privacy Policy is to help you understand Project's data privacy practices. It is important that you understand how your personal information is used, so that you can make an informed decision on whether you would like to access or use the Services and participate in the network.

This Privacy Policy covers the following topics, which you can learn more about by clicking the links below:

## Consent from users outside the EEA, UK and Switzerland

Unless you are based in the European Economic Area (EEA), the United Kingdom (UK), Switzerland or the British Virgin Islands (BVI), by accessing or using the Services or participating in the network, you agree to accept this Privacy Policy (including the ways Project collects, uses, and discloses your personal information). If you are based in the EEA, UK or Switzerland please see below for Project's policies and procedures regarding how Project processes your personal information here.

You can withdraw your consent to Project's collection, use, or disclosure of your personal information by contacting us using the contact information that is included in this Privacy Policy (see below). Please note that if you choose to withdraw your consent, Project may not be able to provide you with certain services, products, communications, and opportunities, including access to and use of the Services and/or participation in the network.

## 3. What is personal information?

Personal information is any information relating to an identified or identifiable individual. Under certain laws that may apply to you, personal information may also include information that identifies a specific household or device.

## 4. Information that Project collects

Project may collect personal information from you based on the Services that you choose to access and use. The personal information that Project may collect from you in connection with your use of the Services is as follows:

- **Publicly Available Blockchain Data.** When you connect your non-custodial blockchain wallet to the Services, Project collects and logs your publicly available

blockchain address to learn more about your use for the Services and to screen your wallet for any prior illicit activity. Project screens your wallet using intelligence provided by leading blockchain analytics providers. Note that blockchain addresses are publicly available data that are not created or assigned by us or any central party, and by themselves are not personally identifying.

- **Information From Tracking Technologies.** Project and Project's third-party service providers may access and collect information from cookies, web beacons, and other similar technologies to provide and personalize the Services and features of the Services for you across sessions. Project may also use this information to learn about your preferences, your use of the Services, and Project's interactions with you. Information Project collects from these technologies may include things such as browser type, referring/exit pages, operating system, device or browser language, and other device information. Project groups and analyzes these user journeys collectively, in the aggregate, to improve Project's product user experience.

- **Information From Other Sources.** Project may receive information about your wallet address, transactions, or reputation data from Project's service providers or partners, including to comply with Project's legal obligations, prevent the use of Project's Services in connection with fraudulent or other illicit activities, and enable Services that rely on such information. Some features of the Services may also collect information from third-party accounts, such as X (Twitter), GitHub, Discord, and others where you authorize the Project to receive information from such accounts.

- **Survey or Usability Information.** If you participate in a survey or usability study with us, Project will record any biographical information you directly provide to us, the responses you provide to us, and your interactions with the Services. For example, this may include your name, email, and job title. Project will also record information about how you use Project's websites, products, and services, including any referral codes that you have been provided by us in connection with your use of the Services.

- **Correspondence**. Project will receive any communications and information you provide directly to us via email, customer support, social media, or another support channel (such as X (Twitter), Telegram, or Discord), or when you participate in any surveys or questionnaires. This will include information you provide to us for technical support and feedback information, as well as your preferences in receiving marketing from Project and Project's third parties.

- **Biographical Information.** If you apply for a job with Project, Project collects all information provided through Project's Jobs forum, including name, email, phone, work and immigration status, and any other resume, cover letter, or free form text you include.

- **Information You Provide to Project.** If you specifically provide Project with information including but not limited to your name, email address, Internet Protocol (IP) address or similar identifiers (username, alias, or Discord ID), Project may use that information for the purposes described when you provided it to Project. You do not need to provide Project with any personal data to use the Services.

- **Device Information** includes the device's hardware information, operating system, platform information, browser type, language information, browser plug-in types.

The types of personal information that Project collects will depend on what personal information you choose to provide to us based on your interactions with Project and the Services and the network.

Project may also collect certain non-personal information in connection with your use of the Services,

including information about your use of the Services and participation in the network, the operating system of your device, application IDs, the type and version of your browser, crash data and analytics, other device identifiers, and other information relating to the manner in which you access or use the Services or participate in the network.

## 5. Use of your personal information

Project uses the personal information that it collects to provide you with the functionality, features, and communications that are available through the Services and to enable Project to manage, maintain, and develop Project's operations. Specifically, Project may use your personal information for the following purposes:

- managing Project's relationship with you, including by assisting you to create an account, communicate with us, and provide you with the Services that you request;

- allowing you to participate in, subscribe to, and receive information, news, updates, and promotional materials from us and third parties;

- complying with your requests and preferences regarding your use of the Services and the manner in which Project communicates with you;

- understanding your preferences and values so that Project can tailor the Services and communications to you;

- protecting us against error, fraud, theft, and damage to Project's Services, business, and property;

- conducting research, analysis, evaluation, and development activities to understand the way the Services are used and to improve the Services, network, and Project's general operations, including with respect to the development of new products, services, and opportunities; or

- allowing us to comply with applicable laws and regulatory purposes.

**Fluent Connect.** If you use Fluent Connect, the Project may use information from your X (Twitter), GitHub, Discord, and other connected accounts, and from third-party reputation data sources that analyze social media engagement, to assign you a reputation tier or score. Higher tiers or scores may allow you to access certain perks or promotions. Project may also share your reputation tier or score with builders within the Services to allow them to source users and build curated experiences for them.

For more information about how Project uses your personal information if you are based in the EEA, UK or Switzerland (including the legal bases Project may rely on to process it), please see additional information for users in the EEA, UK or Switzerland.

## 6. Promotional and transactional communications

Project will collect your consent prior to sending you promotional emails and other electronic messages (e.g., texts, direct messages), except where Project is permitted under applicable laws to send you such messages without doing so. You can opt-out or unsubscribe from receiving promotional messages from us at any time. Promotional messages may include Project's newsletter and updates about Project and its partners' businesses, products, and services.

As part of the Services, you will receive service-related transactional communications about your account and activities. For example, when you create an account or reset your password you may receive an email confirming the details of such activity. You may not opt-out of receiving these

transactional communications.

**7. Disclosure and transfers of personal information**

Project may disclose your personal information in the manner and for the purposes that are described in the sections below.

- **Working with third parties.** Project works with third parties that provide services to us that help Project facilitate one or more aspects of the products, services, communications, or features that it offers to you through the Services. Project may provide these third parties with your personal information directly or they may collect your personal information from you on Project's behalf. These include providers of the following types of services:

  o **Communication service providers.** These service providers assist Project in sending marketing and transactional communications to you. Project shares your email address with them to enable them to provide these services to Project.

  o **Information technology service providers.** These service providers enable Project to operate its services in a reliable manner by providing Project with services like data hosting and cloud computing resources.

  o **Professional advisors.** In limited cases, Project may need to share personal information with its professional advisors like its external lawyers or financial advisors who help Project ensure it is compliant with its legal and financial obligations. Depending on the circumstances, Project may share any of the information described in Section 4 above with them.

- **Business transactions.** Your personal information described in Section 4 above may, depending on the circumstances, be disclosed to a third party in connection with a business transaction, including a change of ownership of Project or its affiliates, the sale of all or certain of Project's assets, or the grant of a security interest. Project will take reasonable steps to ensure that the third party that receives your personal information is bound by appropriate agreements that require that your personal information is handled in a manner that is consistent with this Privacy Policy.

- **Legal requests or protecting rights and interests.** Project discloses your personal information if it determines that such disclosure is necessary to comply with the law, protect Project's or others' rights, property or interests (such as enforcing Project's Terms of Use) or prevent fraud or abuse of its service. Depending on the circumstances, Project may share any of the information described in Section 4 above with these third parties.

- **Fluent Connect.** If you use Fluent Connect, Project may permit other users or builders on the Services to access your information, including your reputation tier or score, to interact with you and provide curated experiences.

Please note that, as Project may disclose your personal information to third parties (including our service providers) as described in this Privacy Policy, your personal information may be collected, used, disclosed, and otherwise processed outside of your jurisdiction of residence. As such, your personal information may potentially be accessible to law enforcement and national security authorities of another jurisdiction where local laws provide for a different level of protection for personal information. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security agencies in those other countries may be entitled to access your personal information.

If you would like further information about Project's policies and practices regarding the transfer and storage of your personal information, including disclosures to third parties such as Project's service providers, please contact us using the contact details below. If you are in the EEA, UK or Switzerland,

you can find out more about these transfers and the legal frameworks Project relies upon for them in transfers outside of the EEA, UK and Switzerland.

Unless you are based in the EEA, UK or Switzerland by providing your personal information to us, you consent to Project's disclosure of this information to its service providers (and other third parties) as described in this Privacy Policy, including those that may be located outside of your jurisdiction of residence.

## 8. Aggregated data

Project may disclose aggregated non-personal information and related usage information, which does not contain personal information that directly identifies you, to third parties, including Project's customers, clients, partners, advertisers, service providers, vendors, suppliers, and content providers.

## 9. Retention of personal information

Project does not keep your personal information forever. Project will retain your personal information for as long as is reasonably necessary for it to complete Project's dealings with you, or as may be required by law, whichever is longer. Project also retains personal information for as long as is necessary to achieve the purposes described in this Privacy Policy, for example, to comply with its legal obligations, to protect Project in the event of disputes, and to enforce its agreements and to protect Project's and others' interests.

The precise periods for which Project retains your personal information vary depending on the nature of the information and the purposes for which Project uses it. Factors that Project considers include any minimum retention period required by applicable or recommended best practices and the period during which a claim can be made with respect to an agreement or other matter.

## 10. Security and protection of personal information

Project maintains commercially reasonable physical, technological, and procedural safeguards that are appropriate based on the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction.

Please advise Project immediately of any incident involving the loss of or unauthorized access to or disclosure of your personal information that is relevant to your use of the Services.

## 11. Your rights related to your personal information

Under the applicable data protection laws like the General Data Protection Regulation ("**GDPR**"), you may have certain rights in relation to Project's processing of your personal information. Please note that these rights are not absolute, and Project may be entitled or obliged to refuse requests where exceptions or exemptions apply under applicable law.

Some of these rights which may apply (depending on your jurisdiction) include the right:

- to obtain access to, and copies of, the personal information that Project holds about you;

- to require Project to correct the personal information Project holds about you if it is incorrect;

- to require Project to erase your personal information in certain circumstances;
- to require Project to restrict the scenarios in which it processes your personal information in certain circumstances;

- to withdraw your consent (where Project relied upon it) to processing of your personal

information - the withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal;

- to require that the processing of personal information for the purposes of direct marketing cease or not begin;

- to object, on grounds relating to your particular situation, to any of Project's particular personal information processing activities where you believe this has a disproportionate impact on you;

- to receive from us the personal information Project holds about you which you have provided to it, in a reasonable format specified by you, including for the purpose of you transmitting that personal information to another data controller; and

- to lodge a complaint with a supervisory authority (such as your local supervisory authority where you reside).

If you want to exercise your rights, please contact Project to do so. Project may request specific information from you to enable it to confirm your identity, if necessary, as well as to search for and provide you with the personal information that Project holds about you. If you require assistance in preparing your request, please contact Project.

## 12. Consent; withdrawal of consent

Unless you are based in the EEA, UK, or Switzerland or you advise us otherwise, through the access and use of the Services, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

## 13. Links to third party resources

The Services may contain links to other websites that may be subject to less stringent privacy standards. These links are provided for your convenience only and you assume all risk in clicking these links to other websites. Project does not assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Project is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

## 14. Cookies and Automatic Data Collection

Project's websites may use automatic data collection technologies to distinguish you from other website users. This helps us deliver a better and more personalized service when you browse Project's website. It also allows Project to improve its websites by enabling Project to:

- Estimate its audience size and usage patterns.

- Store your preferences so Project may customize its websites according to your individual interests.

- Recognize you when you return to Project's website.

The technologies Project uses for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer.

- **Web Beacons, Pixel Tags, Clear Gifs.** Project's website pages and emails may contain small

transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity.

Opt-out preference signals or Global Privacy Controls (GPC) provide consumers with a simple and easy-to-use method by which consumers interacting with us online can automatically exercise their opt-out of sale/sharing rights. Project will process any opt-out preference signals that meet the following requirements:

- A signal that is in a format commonly used and recognized by businesses; and

- The technology or mechanism that sends the opt-out preference signal makes clear to the consumer that the use of the signal is meant to have the effect of opting the consumer out of sale and sharing of their personal information. For example, such technology or mechanism may be an HTTP header field, JavaScript Object, or most commonly, a browser tool or extension that allows users to send the opt-out signal.

## 15. Changes to this Privacy Policy

Project may make changes to this Privacy Policy from time to time. These changes may be made as a result of changes to Project's legal obligations or the ways in which Project collects, uses, discloses, or otherwise processes your personal information.

Project will post an updated version of its Privacy Policy on Project's website when it makes changes and may also notify you of the changes Project has made in other ways if it is required to do so by applicable law. Project encourages you to check this Privacy Policy for updates on a regular basis.

## 16. Contact information

If you have any questions or concerns regarding this Privacy Policy, you should contact Project at privacy@fluentlabs.xyz.

**If you choose to communicate with Project via email, please be aware that email is not a 100% secure medium for sending any personal or confidential information to Project. **

**Additional information for users in the EEA, UK or Switzerland**

**This section is applicable to you only if you are in the EEA, Switzerland or the UK. To the extent there is any inconsistency in this Privacy Policy between what Project says in this section and in the rest of the Privacy Policy, this section will govern if you are based in the EEA, UK or Switzerland.**

For the purposes of the (1) GDPR, as it applies both in the EEA and the UK; and (2) Swiss data protection law, Project is a data controller and can be contacted using the details in Section 16 of this Privacy Policy above.

Project is a data controller subject to the GDPR only insofar as Project is offering goods or services to individuals in the EEA / UK or where the Project Services may be used to monitor individuals' behavior as far as their behavior takes place in the EEA or UK.

**Project's legal bases for using personal information**

Data controllers need a lawful basis to collect and use your personal information.

Project describes below the purposes of its processing (why Project process your information) and its

processing operations (how it processes your information to achieve each purpose). Project also lists the categories of your information that it processes for each purpose and the legal basis it relies upon to do so.

| Processing Activity/Purpose | Lawful Basis | Categories of Data Processed |
|---|---|---|
| Manage Project's relationship with you, including by assisting you to create an account, communicate with us, and provide you with the services that you request. | Performing Project's contract with you. | ● Information provided when you contact Project |
| Understand your preferences and values so that Project can tailor communications to you. | Legitimate Interests (specifically, Project's legitimate interest in understanding its users' preferences so Project can send them marketing communications that are considered likely to be of interest to them). | ● Information provided when you contact Project |
| Allow you to participate in, subscribe to, and receive information, news, updates, and promotional materials from us and third parties. | Consent or, where consent is not required under applicable law, legitimate interests (specifically, Project's legitimate interest in sending you marketing communications (e.g. about news, products, services and us) that are considered to be of interest to you). | ● Information provided when you contact Project |
| Protect us against error, fraud, theft, and damage to the Services or Project's business or property. | Legitimate Interests (specifically, Project's legitimate interests in preventing error, fraud, theft, and damage to its Services, business, and property). | ● Information provided when you contact Project |
| Conduct research, analysis, evaluation, and development activities to understand the way the Services are used and to improve the Services, network, and | Legitimate Interests (specifically, Project's and its users' legitimate interest in us evaluating the use of its services to inform the | ● Information provided when you contact Project |

| Processing Activity/Purpose | Lawful Basis | Categories of Data Processed |
|---|---|---|
| Project's general operations, including with respect to the development of new products, services, and opportunities. | development of future features and improve product direction and development.) | • Technical, Device & Usage Information |
| Allow Project to comply with applicable laws and regulatory purposes. | Legal compliance or, in respect of laws from outside the applicable region, Project's legitimate interest in complying with applicable laws and regulatory purposes. | • Information provided when you contact Project<br><br>• Technical, Device & Usage Information |

**Data transfers outside of the EEA, UK and Switzerland**

In the course of providing you with access to and use of the Project Services, Project may transfer your personal information outside of the EEA, UK and Switzerland, including to the United States. This means that your personal data will not have the automatic protection of data protection laws, including the GDPR, which apply in the EEA, UK and Switzerland. Project relies upon a number of legal frameworks to transfer personal information in such a case. These include:

- Adequacy decision. Project transfers, in accordance with Article 45 GDPR (or equivalent), personal information to recipients that are in a country that the European Commission, UK or Swiss data protection supervisory authority has confirmed, by decision, offers an adequate level of data protection for transferred data ("**adequacy decision**"). Project relies on these adequacy decisions to transfer personal information to recipients located in countries such as the United States, UK, EEA, and Canada. The adequacy decisions are available at the following links:

  o *European Commission adequacy decisions*;

  o *UK adequacy decisions*; and

  o *Swiss adequacy decisions*.

- Data Privacy Frameworks. Project transfers personal data, in accordance with Article 45 GDPR (or equivalent) from the EEA, Switzerland and the UK to recipients in the US that have certified to the EU-U.S. and Swiss-U.S. Data Privacy Frameworks and the UK Extension to the EU-U.S.

- Standard data protection clauses ("SCCs") and other transfer methods. For countries without an adequacy decision, Project transfers, in accordance with Article 46 GDPR (or equivalent), personal information to recipients that have entered into the European Commission, UK or Swiss approved form of transfer contract (SCCs) for the transfer of personal data. Project relies on SCCs to transfer personal information to recipients located in countries such as the

British Virgin Islands and The Bahamas. Project may, where there is no adequacy decision, alternatively make a transfer based upon Article 46 GDPR (or equivalent) using alternative appropriate safeguards such an approved certification mechanism or code of conduct or binding corporate rules or based upon a derogation provided under law (such as Article 49 GDPR). The European Commission approved SCCs are available here and you can request a copy of the SCCs Project uses from Project by using the contact details above.