

Camp Issuer Privacy Policy

Last Updated: April 17, 2024

This Privacy Policy is designed to help you understand how Camp Issuer Inc., an entity incorporated in the British Virgin Islands, and its affiliates (collectively, “Camp Issuer”, “we,” “us,” and “our”) collects, uses, and shares your personal information and to help you understand and exercise your privacy rights.

This Privacy Policy applies to personal information collected and processed by Camp Issuer, which provides a website-hosted user interface (the “Interface”) for accessing Camp Network, a layer two on the Ethereum network (the “Camp Network” and the Interface, the “Services”). For clarity, the Services do not include any decentralized aspect of the Ethereum Blockchain, including Camp Network, that are not controlled by Camp Issuer due to the decentralized nature of the open blockchain networks.

1. Changes to Our Privacy Policy

We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

2. Personal Information We Collect

The categories of personal information we collect depend on how you interact with us, our Services and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services, as described below.

A. Information You Directly Provide to Us

We may collect the following personal information that you provide to us.

- **Blockchain Information.** Your wallet, whether or not custodial, desktop, mobile, or “hot” or “cold” (i.e., MetaMask, Ledger, Fortmatic, etc.) will serve as your account when using our Services. Please note that we do not take possession of your private key. In order to engage in the Services, you will need to provide us with access to or information about your digital wallet and transfers on the Ethereum Blockchain. As you use the Services, we may collect personal information and details associated with the transfers you are involved with.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for any newsletter or marketing promotions we may

create, request customer or technical support, apply for a job or otherwise communicate with us.

- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features. Any personal information you provide on the public sections of these features will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer, such as our developer bounties. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and use this information to assess your qualifications.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as server logs, your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), Internet service provider, and metadata about the content you provide. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookie Policy for Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through your use of our Services.
- **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.

- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality.
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (see Analytics below).
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed.
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party websites.
- **Analytics.** We may use our Technologies and other third-party tools to process analytics information on our Services. These technologies allow us to process usage data to better understand how our website and web-related Services are used, and to continually improve and personalize our Services.
- **Social Media Platforms.** Our Services may contain social media buttons, such as Discord, Twitter, YouTube, which might include widgets such as the “share this” button or other interactive mini programs). These features may collect your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

C. Information Collected from Other Sources

- **Third-Party Sources.** We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings.

3. How We Use Your Information

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services and perform our contract with you, such as:

- Managing your information and accounts.
- Providing access to certain areas, functionalities, and features of our Services.
- Answering requests for customer or technical support.
- Communicating with you about your account, activities on our Services, and policy changes.
- Processing applications if you apply for a job, we post on our Services.
- Allowing you to register for events.

B. Administrative Purposes

We use your information for our legitimate interest, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity. and prosecuting those responsible for that activity.
- Measuring interest and engagement in our Services.
- Improving, upgrading or enhancing our Services.
- Developing new products and Services.
- Ensuring internal quality control and safety.
- Authenticating and verifying individual identities.
- Debugging to identify and repair errors with our Services.
- Auditing relating to interactions, transfers and other compliance activities.
- Sharing information with third parties as needed to provide the Services.
- Enforcing our agreements and policies.
- Other uses as required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law. Some of the ways we may market to you may include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking. If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in “Contact Us” below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law. We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our Services, or other analyses we create.

4. How We Disclose Your Information

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Notice Regarding Use of Public Blockchains.** If you elect to initiate a transaction on the blockchain, all such transfer transactions will be conducted solely through Camp Network and relayed to the Ethereum blockchain. Information about your transactions will be provided to the applicable blockchain and may be accessible to third parties due to the public nature of the blockchain. Because entries to the blockchain are, by their nature, public, and because it may be possible for someone to identify you through your pseudonymous, public wallet address using external sources of information, any transaction you enter onto the blockchain could possibly be used to identify you, or information about you.
- **Third Party Websites and Applications.** You may choose to share personal information or interact with third-party websites and/or third-party applications, including, but not limited to, third-party electronic wallet extensions. Once your personal information has been shared with a third-party website or a third-party application, it will also be subject to such third party's privacy policy. We encourage you to closely read each third-party website or third-party application privacy policy before sharing your personal information or otherwise interacting with them. Please note that we do not control, and we are not responsible for the third-party websites or the third-party applications processing of your personal information.
- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, customer service or other services related to our business.

- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with members of our corporate family.
- **APIs/SDKs.** We may use third-party application program interfaces (“APIs”) and software development kits (“SDKs”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “Contact Us” below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. Your Privacy Choices and Rights

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transfer-related emails regarding Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms of Service or this Privacy Policy).
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we may not be able to honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Interest-Based Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based

opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for Android, iOS and others.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the Network Advertising Initiative, the Digital Advertising Alliance, the European Digital Advertising Alliance, and the Digital Advertising Alliance of Canada.

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- Access Personal Information about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; or (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (aka the right of data portability).
- Request Correction of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information.
- Request Deletion of your personal information.
- Request Restriction of or Object to our processing of your personal information, including where the processing of your personal information is based on our legitimate interest or for direct marketing purposes; and
- Withdraw Your Consent to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.

Notwithstanding the above, we cannot edit or delete any information that is stored on a blockchain, for example the Ethereum blockchain, as we do not have custody or control over any blockchains. The information stored on the blockchain may include purchases, sales, and transfers related to your blockchain address.

6. Security of Your Information

We take steps designed to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail or by sending an email to you.

7. International Data Transfers

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

8. Retention of Personal Information

We may store the personal information we collect as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. Supplemental Notice for California Residents

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 ("CCPA"). The CCPA provides California residents with the right to know what categories of personal information Camp Issuer has collected about them and whether Camp Issuer disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

(A) Category of Personal Information That May Be Collected by Camp Issuer vs.
(B) Categories of Third Parties That Personal Information is Disclosed to for a Business Purpose

1A. Identifiers

A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.

1B. Third Parties

- Service providers
- Third-party websites or applications
- Blockchain networks

- Other users or third parties you interact with

2A. Personal information categories listed in Cal. Civ. Code § 1798.80(e)

A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories

2B. Third Parties

- Other users or third parties you interact with
- Third-party websites or applications (e.g., wallet providers; third-party identity verification services)
- Blockchain networks
- Other users or third parties you interact with

3A. Protected classification characteristics under California or federal law

Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

3B. Third Parties

- Service providers (recruitment context)

4A. Commercial Information

Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

4B. Third Parties

- Service providers
- Blockchain networks
- Other users or third parties you interact with

5A. Sensory Data

Audio, electronic, visual, or similar information

5B. Third Parties

- Service providers that support the social network platform.
- Data analytics providers
- Other users (your posts).

6A. Internet or other electronic network activity

Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.

6B. Third Parties

- Service providers
- Blockchain networks
- Other users or third parties you interact with

7A. Professional or employment-related information

Current or past job history or performance evaluations.

7B. Third Parties

- Service providers

8A. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99).)

Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

8B. Third Parties

- Service providers

9A. Inferences drawn from other personal information to create a profile about a consumer

Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

9B. Third Parties

- Service providers

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in “Personal Information we Collect” and “How We Use of Your Information” above, respectively.

“Sales” of Personal Information under the CCPA. For purposes of the CCPA, Camp Issuer does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

Additional Privacy Rights for California Residents

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth in “Contact Us” below.

Verification. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you. If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.

Accessibility. This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium’s Web Content Accessibility Guidelines, version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

Right for minors to remove posted content. Where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly viewable portions of the Services by contacting us directly as set forth in “Contact Us” below.

Notwithstanding the above, we cannot edit or delete any information that is stored on a blockchain, for example the Ethereum blockchain, as we do not have custody or control

over any blockchains. The information stored on the blockchain may include purchases, sales, and transfers related to your blockchain address.

10. Supplemental Notice for Nevada Residents

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us as set forth in “Contact Us” below with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

11. Children’s Information

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may contact us as set forth in “Contact Us” below. If we learn that we have collected a child’s personal information in violation of applicable law, we will promptly take steps to delete such information.

12. Third-Party Websites / Applications

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

13. Supervisory Authority

If you are located in the European Economic Area, Switzerland, or the United Kingdom you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

14. Contact Us

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

Camp Issuer Inc.
Jayla Place, 2nd Floor, Road Town, Tortola, British Virgin Islands VG1110
legal@campnetwork.xyz