

PRIVACY POLICY – FUMBI WALLET

1. Basic Information

This Privacy Policy governs the processing of personal data in connection with the use of Fumbi Wallet (the “**Wallet**”).

The controller of personal data is FUMBI, s. r. o., Suché mýto 6, 811 03 Bratislava, Company ID: 55 651 232 (hereinafter “**FUMBI**”).

For the purposes of this Policy, a “**User**” means a natural person using the Wallet.

This Policy applies to the use of the Wallet regardless of whether the User also uses other services provided by FUMBI.

Capitalized terms not defined in this Privacy Policy shall have the meaning assigned to them in the Fumbi Wallet Terms of Use.

2. What Data We Process

In connection with the use of the Wallet, we process only a limited scope of data, in particular:

- first name, surname, and email address, if provided in connection with the User’s registration on the Platform,
- technical data about the device and application (e.g. device type, application version),
- IP address and basic operational logs,
- data on the use of Wallet functionalities,
- data provided in communication with customer support.

If the User connects the Wallet with their Fumbi Account or simultaneously uses other services provided by FUMBI, FUMBI may also process additional personal data available to it within the provision of such other services, to the extent necessary to ensure the connection and related functionalities. The processing of such data is also governed by separate contractual and information documents applicable to those services.

3. What We Do Not Process

FUMBI does not have access to:

- the User’s private keys,
- the seed phrase,
- digital assets held in the Wallet or any data relating thereto.

These data are under the exclusive control of the User.

4. Purposes and Legal Bases

We process personal data primarily for the following purposes:

- ensuring the functionality of the Wallet,
- technical support and maintenance,
- security and prevention of misuse,
- improvement of the Wallet.

The legal basis for processing is primarily:

- performance of a contract,
- FUMBI's legitimate interest,
- compliance with legal obligations, where applicable.

Personal data are also processed for the purposes of ensuring the security of the Wallet and preventing its misuse, including the technical identification of risky or unusual transactions or interactions with blockchain addresses, including the assessment of the risk level of blockchain addresses and transaction patterns, as well as screening against sanctions lists and the use of blockchain analytics tools (e.g. solutions provided by Crystal Blockchain). These activities do not constitute the performance of obligations under legal regulations in the field of anti-money laundering and counter-terrorist financing in relation to the use of the Wallet as a standalone service.

Such processing is based primarily on FUMBI's legitimate interest in protecting its systems, Users, and the integrity of the service provided.

If the User also uses other services provided by FUMBI or connects the Wallet with their FUMBI Account, the processing of personal data may also be governed by specific legal bases applicable to those services, including compliance with legal obligations in the field of AML/CFT.

5. Recipients of Data

Personal data may be disclosed in particular to:

- providers of IT and cloud services,
- tools for analytics and technical support,
- FUMBI NETWORK j. s. a. as the technical operator of the Platform (to the necessary extent).

Personal data may also be disclosed to public authorities where required by law.

6. Retention Period

Personal data are retained only for the period necessary to achieve the above purposes, in particular to ensure the functionality, security, and support of the Wallet, or for the period required by applicable laws.

7. Your Rights

You have the right:

- to access personal data,
- to rectification,
- to erasure,

- to restriction of processing,
- to object to processing,
- to lodge a complaint with the competent supervisory authority, in particular the Office for Personal Data Protection of the Slovak Republic.

8. Blockchain

Transactions on public blockchains are publicly visible. This characteristic is not under the control of FUMBI.

9. Contact

FUMBI, s. r. o.
Suché mýto 6, Bratislava
e-mail: info@fumbi.network