

Turnkey Privacy Policy

Last Updated: August 8, 2023

This privacy policy is designed to help you understand how Turnkey Global, Inc. (“**Turnkey**,” “**we**,” “**us**,” or “**our**”) collects, uses, processes, and shares your personal information, and to help you understand and exercise your privacy rights (“**Privacy Policy**”).

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us when providing our non-custodial key management solution, including on our websites, and other online or offline offerings (the “**Turnkey Services**”). By using the Turnkey Services, you acknowledge the practices outlined in this Privacy Policy. Capitalized terms used but not defined herein shall have the respective meanings given to them in the Turnkey Terms of Service (the “**Terms**”).

Changes to our Privacy Policy. We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well. We will post any changes we make to our Privacy Policy on this page and, where appropriate, we will provide you with reasonable notice of any material changes before they take effect or as otherwise required by law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Turnkey 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 Turnkey Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Turnkey Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Creation.** We may collect personal information when you create an account, such as email address, wallet addresses, name, and account name.
- **Protocol Payloads, Wallet and other Output Information.** In order to utilize some of the Turnkey Services, you may need to provide us with information about your wallet(s) including the types and amounts of digital assets on the blockchain you possess and details about Protocol payloads into which you have entered. We will never ask you for your private keys, API keys, or authenticators.
- **Your Communications with Us.** We may collect personal information, such as names and email addresses, when you request information about our Turnkey Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.
- **Interactive Features.** We and others who use our Turnkey Services may collect personal information that you directly submit to us through our interactive features.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Turnkey Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Turnkey Services, such as your internet protocol (IP) address, user settings, MAC address, information about the browser, operating system and device you're using, device characteristics and identifiers, location information (including approximate location derived from IP address), and internet service provider. We may also automatically collect information regarding your use of our Turnkey Services, such as pages that you visit before, during and after using our Turnkey 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 Turnkey Services.
 - **Crash Reports.** If you provide crash reports, we may collect personal information related to such crash reports, including detailed diagnostic information about your device and the activities that led to the crash.
- **Analytics.** We may use Technologies and other third-party tools to process analytics information on the Turnkey Services. These Technologies allow us to better understand how our digital Turnkey Services are used and to continually improve and personalize the Turnkey Services. Some of our analytics partners include:
 - **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).

C. Personal Information Collected from Other Sources

We may collect personal information from other sources when you use our Turnkey Services.

- **Blockchain Networks.** We may independently collect personal information from blockchain networks that we have access to. This personal information may include public wallet addresses and details about transactions carried out on the applicable blockchain network.

3. HOW WE USE YOUR PERSONAL INFORMATION

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

A. Provide Our Turnkey Services

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

- Determine your eligibility to use the Turnkey Services;
- Create and maintain your account;
- Respond to your comments, questions and requests and provide customer service;
- Provide and deliver the products and services you request;
- Process transactions and provide you related information, including invoices, confirmations and receipts;

- Provide support and assistance for the Turnkey Services; and
- Provide, maintain and improve our Turnkey Services.

We use your information where it is in our legitimate business interests to do so, such as to:

- Send you technical notices, updates, security alerts and support and administrative messages;
- Monitor and analyze trends, usage and activities in connection with our Turnkey Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Turnkey and others;
- Personalize and improve the Turnkey Services and provide content or features that match user profiles or interests;
- Ensure and improve the security of our website and the Turnkey Services; and
- Link or combine with information we get from others to help understand your needs and provide you with better service.

B. Marketing our Products and Turnkey Services

As permitted by applicable law — and unless your consent is required — it is in our legitimate business interests to use personal information to tailor and provide you with content (including about our products, services, news and information) via email.

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 or by following the unsubscribe link provided in each email.

C. With Your Consent

We may use personal information for other purposes where you provide your consent.

D. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law, including where such purposes are clearly disclosed to you at the time you provide your personal information.

- **De-identified or Aggregated Information.** We may use personal information to create de-identified, anonymized and/or aggregated information, such as demographic information, information about the device from which you access our Turnkey Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Turnkey 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 Turnkey Services

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

- **Notice Regarding Use of Blockchain Networks.** Information about transactions you enter into via the Turnkey Services will be recorded on the 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.
- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Turnkey Services or who otherwise perform business-related functions for Turnkey. This includes:
 - Third-party Protocol participants;
 - Technology, hosting and telecommunications vendors and IT support;
 - Compliance and security risk assessment service providers;
 - Support and customer service vendors;
 - Payment processing companies, such as Stripe;
 - Vendors providing accounting, auditing, tax, legal, and other professional services; and
 - Analytics providers.
- **Third-Party Services You Share or Interact With.** Certain features and functionalities of the Turnkey Services may link to or allow you to interface, interact, or share information with, access and/or use third-party websites, services, products, and technology (collectively, “**Third-Party Services**”). Any information shared with or otherwise collected by a Third-Party Service may be subject to the Third-Party Service’s privacy policy. We are not responsible for the processing of personal information by Third-Party Services.
- **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 with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our company affiliates.

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 disclosed, 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 transaction-related emails regarding products or Turnkey Services you have requested. We may also send you certain non-promotional communications regarding us and our Turnkey Services, and you will not be able to opt out of those communications (e.g., communications regarding our Turnkey Services, your account or updates to our Terms 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 do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Personalized Advertising.** We, as well as third parties that provide content, advertising, or other functionality on the Turnkey Services, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect information through your use of the Turnkey Services. 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, the Turnkey 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](#) 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 and depending on your location, you may have the right to:

- **Access to, and Portability of, Your Personal Information**, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format;
- **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; 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.

6. SECURITY OF YOUR INFORMATION

We take steps 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 access, use, disclosure, or loss of personal information.

By using our Turnkey 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 Turnkey Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Turnkey Services, by mail, or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

You transfer your personal information directly to us in the United States. All information processed by us may be further 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 will safeguard your information consistent with the requirements of applicable laws.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Turnkey Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Turnkey 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

Beginning January 1, 2020, the California Consumer Privacy Act ("**CCPA**") gives California residents certain rights with respect to the processing of personal data (known as "personal information" under the CCPA).

This supplement provides additional privacy disclosures and details additional rights and should be read in conjunction with our Privacy Policy.

Collection of Information

Section 2 of our Privacy Policy sets forth the categories of personal information that we collect and process about you, a description of each category, and the sources from which we obtain each category. Section 3 describes how we use your personal information, and Section 4

describes our sharing practices.

Your Rights

Right to Know. Under the CCPA, you have a right to request information about our collection, use, and disclosure of your personal information over the prior 12 months, and request that we provide you with the following information:

- Categories of and specific pieces of personal information we have collected about you.
- Categories of sources from which we collect personal information.
- Purposes for collecting personal information.
- Categories of third parties with whom we share personal information.
- Categories of personal information disclosed about you for a business purpose.
- If applicable, categories of personal information sold about you and the categories of third parties to which the personal information was sold, by category or categories of personal information for each third party to which the personal information was sold.

Right to Delete. You also have a right to request that we delete personal information, subject to certain limitations under applicable law.

Right to Opt-out From Sale. You may request to opt-out of any "sale" of your personal information that may take place. We do not rent or sell personal information and take care to not enter into any data sharing arrangements that could constitute a "sale" under the CCPA.

Non-discrimination

We will not discriminate against you for exercising any of your rights under the CCPA.

10. CHILDREN'S INFORMATION

The Turnkey Services are not directed to children under 16 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in "[Contact Us](#)" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account, if applicable.

11. OTHER PROVISIONS

Third-Party Websites/Applications. The Turnkey Services may contain links to other websites/applications and other websites/applications may reference or link to our Turnkey 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.

Payment Processing. Please be advised that your use of our payment processing partner, Stripe, Inc. ("Stripe"), is subject to Stripe's privacy policy and terms and conditions. By using the Stripe services, you agree to be bound by Stripe's terms of service and privacy policy, which can be found on its website.

Data Protection Regulator. Depending on your location, you may have the right to lodge a complaint with the competent data protection regulator if you believe our processing of your personal information violates applicable law.

12. CONTACT US

Turnkey is the entity responsible for the personal information we process under this Privacy Policy.

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: privacy@turnkey.com.