

PRIVACY POLICY

Effective Date: July 16, 2026

This Privacy Policy describes how the Upscale team (“Upscale,” “we,” “us,” or “our”) collects, uses, stores, and discloses information in connection with <https://upscale.trade/>, <https://app.upscale.trade/>, and any related services (collectively, the “Services”).

Upscale operates under the jurisdiction of Seychelles. The Services are offered on a global basis, except where restricted by applicable rules or platform policy, including for U.S. residents. The Services are intended only for persons 18 years of age or older.

By accessing or using the Services, you acknowledge this Privacy Policy.

1. Contact

Privacy inquiries may be sent to:

https://t.me/Storm_Support_bot or info@upscale.trade

2. Scope

This Privacy Policy applies to information processed in connection with:

- the Upscale website;
- the Upscale trading terminal;
- user accounts;
- support communications;
- challenge purchases;
- on-chain payouts;
- tournaments and related platform features.

3. Information We Collect

We collect limited information necessary to operate the Services.

3.1 Account and authentication information

Depending on the login method you use, we may collect:

- public wallet address and related public wallet identifiers;

- Email address and public profile data;
- Telegram account data and public profile data;
- FSL ID and related public profile data;
- username;
- avatar;
- display name.

We do not request or store wallet seed phrases, private keys, or wallet passwords.

3.2 Account and platform information

We may collect:

- internal account ID;
- login timestamps;
- account settings;
- referral code and referrer information;
- payout wallet address;
- transaction-related references associated with purchases or payouts.

3.3 Trading and activity information

We may collect:

- simulated trading history;
- order history;
- position history;
- challenge status;
- funded status;
- profit and loss data;
- equity and drawdown metrics;
- tournament participation data;
- platform usage analytics.

3.4 Technical and device information

We may collect:

- IP address;
- browser and device data;
- operating system;
- session data;
- access logs;
- usage logs.

3.5 Support information

If you contact support through Mava, we may process:

- your username and/or email address;
- support message content;
- ticket metadata;
- communication history.

3.6 Payment information

Payments are processed through external providers. We may receive limited payment-related data, including:

- payment status;
- amount;
- currency;
- transaction hash, where applicable;
- invoice ID;
- payment ID or similar provider reference.

3.7 Payout information

For on-chain payouts, we may process:

- payout wallet address;
- payout amount;
- transaction hash;
- payout status information.

4. Sources of Information

We collect information:

- directly from you;
- from your chosen authentication provider;
- automatically through your use of the Services;
- from payment providers in limited form;
- from support communications submitted through Mava.

5. How We Use Information

We use information to:

- create and maintain user accounts;
- authenticate access;
- provide and operate the Services;
- process purchases and reconcile payment status;
- process and record on-chain payouts;
- provide customer support;
- maintain platform security, integrity, and stability;
- analyze usage and improve the Services;
- send operational and account-related communications by email or Telegram.

Marketing Communications

Where a user has provided consent, we may use the email address associated with the user's account to send marketing and informational communications from Upscale.

These communications may include:

- news and updates about Upscale;
- information about challenges, markets, tournaments, and platform features;
- promotions, promo codes, discounts, and special offers;
- educational and other useful content;
- re-engagement communications;
- personalized offers based on the user's account activity, purchases, challenge participation, trading activity, preferences, or interactions with the Services.

Consent to receive marketing communications is voluntary and is not required to create an account, purchase a challenge, or use the Services.

Users may withdraw their consent at any time by using the unsubscribe link included in a marketing email or by contacting Upscale support through the contact details specified in this Privacy Policy.

Withdrawal of consent applies only to marketing communications and does not affect operational, security, account-related, transactional, payment, payout, or other service communications necessary to provide the Services.

6. Cookies, Storage, Analytics, and Advertising Tools

We use cookies and similar technologies, including `localStorage` and `sessionStorage`, for operational, analytical, and attribution purposes.

These technologies may be used to:

- maintain sessions;
- remember preferences;

- support authentication;
- measure product usage;
- analyze performance;
- support advertising attribution.

We currently use:

- PostHog;
- Google Ads.

You may manage certain browser storage settings through your browser controls, but disabling them may affect the functionality of the Services.

7. Support via Mava

User support is provided through Mava, which acts as a service provider processing support-related data on our behalf.

Support chat history is retained for 30 days.

8. Payments

Payments may be made through external providers and payment channels, including:

- cryptocurrency;
- Telegram Stars;
- bank transfers.

Where payment details are required for processing, they are submitted at the provider or gateway layer, not directly to Upscale, unless expressly stated otherwise.

Upscale receives only the limited payment-related information necessary to confirm and reconcile transactions.

9. Blockchain Transparency

Certain activities related to the Services, including payouts, are conducted on public blockchain networks.

Blockchain transactions are public by design and may be visible to anyone. This may include wallet addresses, transaction hashes, timestamps, and transferred amounts.

Upscale may display blockchain transaction links or references related to payouts without displaying usernames, email addresses, or other direct profile identifiers.

Information written to a blockchain may remain publicly accessible independently of Upscale and may not be modified or deleted by Upscale.

10. Tournaments and Public Disclosures

Upscale may operate tournaments or similar features. Tournament displays do not include user nicknames, wallet addresses, email addresses, or other direct account identifiers.

Where payout-related blockchain references are displayed, such references are not accompanied by direct user profile identifiers.

11. Legal Grounds

Where applicable, we process information on the basis of:

- performance of a contract;
- legitimate interests in operating, securing, improving, and supporting the Services;
- compliance with legal obligations;
- consent, including where a user has agreed to receive marketing and personalized email communications.

12. Disclosure of Information

We do not sell personal information.

We may disclose information:

- to service providers supporting the operation of the Services;
- to payment or payout infrastructure providers where necessary;
- to support service providers;
- to email delivery and marketing communication service providers where necessary to send communications to users who have provided consent;
- where required by applicable law, legal process, or competent authority;
- where necessary to protect rights, enforce terms, investigate disputes, or defend claims;
- in connection with a reorganization, merger, asset transfer, financing, or similar transaction.

Except where necessary to operate the Services or comply with legal obligations, information is used only within the Upscale team.

13. International Processing

Due to the global nature of the Services, information may be processed across multiple jurisdictions as required for technical operation, support, communications, or infrastructure.

Where applicable, we apply reasonable safeguards appropriate to the nature of the information and the processing involved.

14. Retention

We retain information for as long as reasonably necessary for service operation, recordkeeping, support, security, payment reconciliation, dispute handling, and compliance purposes.

Specific retention period:

- support chat history: 30 days.

Other information may be retained for operational or technical necessity, including records associated with payments, payouts, logs, account history, and blockchain-related activity.

Where information is processed for marketing purposes based on consent, it may be used for such purposes until the user withdraws consent or opts out of marketing communications.

Upscale may retain limited records of consent and opt-out requests where reasonably necessary to demonstrate compliance and prevent further marketing communications.

Because blockchain records are public and immutable by nature, they may remain permanently accessible outside Upscale's systems.

15. Security

We implement reasonable technical and organizational measures designed to protect information from unauthorized access, use, disclosure, alteration, or destruction.

Such measures may include:

- encryption in transit;
- encryption at rest where appropriate;
- access controls;
- audit logs;
- backups;
- monitoring and incident response processes.

No method of storage or transmission is fully secure. Accordingly, we do not guarantee absolute security.

16. Your Rights

Depending on applicable law, you may have rights to:

- request access to information we process about you;
- request correction of inaccurate information;
- object to certain processing;
- request restriction of certain processing;
- withdraw consent where processing is based on consent;
- opt out of marketing communications at any time by using the unsubscribe link included in an email or by contacting Upscale support.

Requests may be sent to:

info@upscale.trade

Requests relating to marketing communications may also be submitted through:

https://t.me/Storm_Support_bot

We may require verification before responding.

Certain requests may be limited where retention is necessary for security, technical integrity, payment reconciliation, dispute management, compliance, or where information is recorded on a public blockchain and cannot be altered or erased by Upscale.

17. No Standard KYC Collection

Upscale does not conduct standard KYC collection as part of ordinary access to the Services.

Upscale does not request:

- wallet seed phrases;
- private keys;
- wallet passwords.

Upscale processes only limited account and public profile information necessary to provide access to the Services.

18. Age and Eligibility Restrictions

The Services are available only to persons 18 years of age or older.

The Services are not intended for U.S. residents or for persons prohibited from using the Services under applicable rules or platform restrictions.

If Upscale becomes aware that a person under 18 is using the Services, access may be restricted or terminated.

19. Changes to This Policy

We may amend this Privacy Policy from time to time. Any updated version becomes effective upon posting on the relevant Upscale website or application, unless otherwise stated.

Continued use of the Services following the effective date of an updated Privacy Policy constitutes acknowledgment of the revised version.

Where required by applicable law, material changes affecting consent-based processing may require renewed consent.

20. Contact

For privacy-related questions, requests to withdraw consent, or requests to opt out of marketing communications, contact:

https://t.me/Storm_Support_bot or info@upscale.trade