

Gensyn Foundation

Privacy Policy

Effective Date: March 20 2026

1. Introduction

Gensyn Foundation (“**Gensyn**”, “**us**”, “**we**”, or “**our**”) respects the privacy of our users (“**you**” or “**your**”). This Privacy Policy (“**Policy**”) describes how we collect, process, share, and safeguard personal information that is collected via our website (gensyn.network) (“**Website**”) and via our applications (collectively with Website referred to as “**Platform**”). It also tells you about your rights and choices with respect to your personal information, and how you can contact us if you have any questions or concerns.

Gensyn Foundation will be the data controller of your personal information in accordance with data protection laws of the European Economic Area (“**EEA**”), the United Kingdom (“**UK**”) (in respect of EU and UK data subjects) and the Cayman Islands (together, the “**Data Protection Legislation**”).

2. Personal Information We Collect

We collect personal information from you in the following ways:

Personal Information You Provide to Us

- **Token exchange and transaction data:** the Platform may allow users to purchase or exchange tokens from time to time. We or our service providers may collect personal information necessary to record, facilitate, and secure these transactions. This may include: token transaction records (including the sender, recipient, date, time, amount, and status of each token transfer), token balances associated with your account, wallet identifiers or account IDs (if tokens are stored in or linked to a digital wallet), transaction metadata (such as logs and identifiers used to process, validate, or audit token exchanges).
- **Interaction and communication data:** we collect personal information that you generate when you engage with features on the Platform, including the date, time, frequency, and duration of your interactions with platform features.
- **Social platforms.** You or social platform providers (such as X (Twitter), Discord, Github and Hugging Face) may provide us with information through the social platform, and we will treat such information in accordance with this Policy.

Automatic Data Collection

We and our service providers may automatically log information about you, your computer, or mobile device, and our communications with you, including:

- **Device Information:** The manufacturer and model, operating system, IP address, and unique identifiers of the device, as well as the browser you use to access the Platform. The information we collect may vary based on your device type and settings.
- **User Experience Information:** Information about how you engage with our Platform such as the types of content that you view or actions you take on our Platform, and the time, frequency, and duration of your activities.

- **Location Information:** We may derive a rough estimate of your location from your IP address when you visit the Platform.

We collect this information using cookies and other similar technologies.

Sensitive Information

Gensyn does not intentionally collect or permit you to send to Gensyn any sensitive personal information, such as genetic data, health information, or religious information.

3. How We Use Your Personal Information

We will use your personal information for one or more of the purposes set out below.

- **To operate and deliver our Platform.** We will use your personal information to perform our contractual obligations and when it is in our legitimate business interests, including to:
 - Provide, operate, maintain, and secure our Platform;
 - Provide support assistance and troubleshooting;
 - To send you updates about administrative matters such as changes to our terms or policies; and
 - Provide user support, and respond to your requests, questions and feedback.
- **To improve, monitor, personalise, and protect our Platform.** It is in our legitimate business interests to improve and keep our Platform safe, which includes:
 - Analysing and understanding how you visit our Platform, how you interact with us and to enrich your user experience and customise your relationship with us;
 - Protecting the security of our Platform; and
 - Preventing and detecting security threats, fraud or other criminal or malicious activities.
- **To comply with legal obligations and to defend Gensyn against legal claims or disputes.** We may use your personal information to comply with our legal obligations or when it is in our legitimate business interests, which includes to:
 - Comply with applicable laws, regulations, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
 - Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
 - Audit our compliance with legal and contractual requirements and internal policies; and
 - Protect the security of and manage access to our premises and prevent, identify, investigate and deter fraudulent, harmful, unauthorised, unethical or illegal activity, including cyberattacks and identity theft.

- **For marketing and advertising.** We may use your personal information for marketing and advertising purposes, including to send you direct marketing communications as permitted by law.

We will only use your personal information if we have your consent or where there is another lawful basis to do so. This includes when it is in our legitimate business interest to use your personal information. We can only rely on our legitimate business interest, if it is fair and reasonable to do so.

4. How We Share Your Personal Information

We do not sell, rent, license, or lease your personal information to third parties.

In certain circumstances, however, we may share personal information without further notice to you, except where such notice is required by the law, with the following categories of third parties:

- **Third Party Partners:** To help us carry out certain identification and eligibility checks, we will share your personal information with third party providers, such as Sonar (operated by Gm Echo Clicks Ltd – privacy policy: [Sonar - Legal — Echo](#)).
- **Professional Advisors:** We may share personal information with our professional advisors such as lawyers and accountants where doing so is necessary to facilitate the services they render to us.
- **Legal Requirements:** We do not volunteer your personal information to government authorities or regulators, but we may disclose your personal information where required to do so in order to comply with laws and regulations applicable to us as described above.
- **Business Transaction:** If Gensyn is involved in a merger, acquisition or asset sale, financing due diligence, reorganisation, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your personal information may be sold, transferred, or otherwise shared including as part of any due diligence process.
- **Affiliates:** We may share your personal information with our wholly owned subsidiary, Gensyn Network Ltd and other third-party service providers. Service providers generally act as processors in its own right. where this is necessary for compliance with a legal obligation to which it is directly subject (for example, to comply with applicable law or where mandated by a court order or regulatory sanction).

5. Your Rights and Choices

You have certain rights regarding how we process your personal information, including the right to:

- **access** the personal information we hold about you;
- request we **correct** any inaccurate personal information we hold about you;
- request we **delete** any personal information we hold about you in certain circumstances;
- **restrict** the processing of personal information we hold about you;
- **object** to the processing of personal information we hold about you;
- receive any personal information we hold about you in a **structured and commonly used machine readable format** or have such personal information transmitted to another company;
- and
- **withdraw any consent** you previously provided to us regarding the processing of your personal

information at any time. We will apply your preferences going forward. This will not affect the lawfulness of the processing before you withdrew your consent.

If you would like to exercise any of these rights, please email us or write to us as provided in the **“Contact Us”** section below. We may ask for specific information from you to help us confirm your identity. Depending on where you reside, you may be entitled to empower an authorised agent to submit requests on your behalf. We will require authorised agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

You may opt out of marketing-related communications by following the opt out or unsubscribe instructions contained in any marketing communication we send you.

In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in the **“Contact Us”** section below.

6. International Data Transfers

We will transfer your personal information internationally, to countries such as the United States. These countries may not provide the same protections as the Data Protection Legislation. We will ensure that relevant safeguards are in place to afford adequate protection for your personal information, and we will comply with the Data Protection Legislation, which may include relying on an EU Commission or UK government adequacy decision, on contractual protections for the transfer of your personal information, or a derogation if available. For more information about how we transfer personal information internationally, please contact us as set out in the **“Contact Us”** section below.

7. Children’s Privacy

Our Platform is not directed at children, and we do not knowingly collect personal information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us as set out in the **“Contact Us”** section below.

8. Retention of Personal Information

We retain your personal information only for as long as is necessary to fulfil the purposes for which it was collected and processed, in accordance with our retention procedures, and in accordance with applicable laws.

To determine the appropriate retention period for your personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Security of Personal Information

We use reasonable organisational, technical and administrative measures designed to protect against unauthorised access, misuse, loss, disclosure, alteration, and destruction of personal information we process. Unfortunately, data transmission over the Internet cannot be guaranteed as completely secure. Therefore, while we strive to protect your personal information, we cannot guarantee its security.

10. Do Not Track

Some internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

11. Links to Other Sites

Our Platform may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third party sites or services.

12. Changes and Updates to This Policy

We will update this Policy from time to time. Please review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.

If we make material changes, we will let you know.

13. Complaints

If you wish to lodge a complaint about how we process your personal information, please contact us at legal@gensynfoundation.org. We will endeavor to respond to your complaint as soon as possible. You may also lodge a complaint with a supervisory authority, including the Cayman Islands Data Protection Ombudsman. You may also be able to lodge a complaint with a supervisory authority in your country of residence, place of work, or where you believe an incident took place. For example, if you are based in the UK, you may choose to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>.

15. Contact Us

Gensyn is the entity responsible for the processing of your personal information, and is the data controller in respect of such processing. If you have any questions or comments about this Policy, our privacy practices, or if you would like to exercise your rights with respect to your personal information, please contact us by email at legal@gensynfoundation.org.