PRIVACY POLICY

Last updated on October 06, 2026

This Privacy Policy (**"Policy"**) describes how Personal data of Data subjects are processed by **Tech Castle OÜ** (hereinafter each entity referred to as **"NOWNodes"** or **"We",** as context requires) when they use the Website (**"Website"**), and/or interact with our online advertisements or marketing emails. By accepting this Policy, you agree to be legally bound by it and all terms incorporated by reference.

NOWNodes treats collection and use of its Data subjects' data responsibly. The Policy was developed in accordance with international data protection standards and applicable privacy laws. We confirm that our internal processes are aligned with the Policy.

- We have implemented different technical and organizational solutions to comply with applicable legislation related to the processing of Personal data, privacy, and data security in countries where we operate or where the applicable law applies to us.
- NOWNodes maintains safeguards necessary to ensure the confidentiality, availability, and integrity of Personal data as required by applicable laws and regulations.

Disclaimer: Please note that according to Terms of Use NOWNodes acts as a service provider and doesn't track any sensitive information such as wallets' keys, balances, and other financial information. NOWNodes is neither a party to virtual currency transactions, nor has any rate or commission decision making powers.

DEFINITIONS:

"Website" - website with the URL: https://nownodes.io/.

"NOWNodes", **"Ourselves"**, **"We"** and **"Us"** refer to the company:

- **Tech Castle OÜ,** a legal entity, incorporated according to the laws of the Republic of Estonia, registration number: 14050527, legal address: Harju maakond, Tallinn, Kesklinna linnaosa, Vesivärava tn 50-301, 10152.

"Data subject" or **"User"** - a natural person who visits the Website and / or NOWNodes Services.

"Personal data" - information that relates to Data subject and identifies Data subject.

"Party" refers to either You or Us. For the avoidance of any doubt, the contracting Parties under these Terms are You and NOWNodes.

"Services" - blockchain-as-a-service IT solution services that let Users get access to full nodes and explorers via API. With this service, Users can quickly get the information they need from the blockchain.

PURPOSES OF DATA PROCESSING

NOWNodes has the right to process Personal data for the following purposes:

analyzing the interaction of Data subjects with the Website, rendering Services, optimization and improvement of the Services, calculation of the fees for Services rendered, statistical and analytical purposes, User support, improving the work of the Website; providing the User with all the functionality of the Website.

LEGAL BASIS OF DATA PROCESSING AND LIST OF DATA PROCESSED

There are legal grounds necessary for the processing of Personal data and we count on them to process your Personal data.

We do NOT collect any Personal data other than the Personal data set out in this Policy. We do NOT collect any financial data. Other data may be collected by third parties; we are not responsible for the actions of third parties.

We use the main four grounds to process your Personal data: consent, legal obligation, legitimate interests (to perform terms and conditions):

PERSONAL DATA	WHEN WE PROCEED PERSONAL DATA IT AND WHAT FOR
Cookies	Keeping the Website running, Improving the Website, Statistical reasons, Analyzing the interaction of Data subjects with the Website for creating and launching marketing and ad campaigns on the Internet
E-mail, API key	Providing Services, Authorization on the Website
Statistical usage data derived from the Services (i.e., the number of requests sent by Users)	To optimize and improve the Services or otherwise operate NOWNodes business; and to calculate the fees under the current tariff plan (as defined in Service Agreement).
E-mail	Providing updates which may be interesting to you
	Customer support

CATEGORIES OF RECIPIENTS

In the course of providing our Services, we may share certain Personal data with third parties to facilitate the provision and improvement of our Services.

We may disclose your Personal data to the following categories of recipients: communication service providers, payment processing service providers.

The disclosure of Personal data to such recipients is conducted in accordance with applicable data protection requirements and industry standards.

COOKIES

Cookies are small fragments of data sent by our web server and stored on the user's device. Cookies are stored when you visit the Website, and this allows us to make it work effectively: Cookies allow us to save your selected settings (e.g., language) and analyze Website traffic.

Cookies are used when users are logged in, so that the service provider can remember and identify you as users. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

When you submit data through a form such as a contact page or comment box, cookies may be set to remember your user details for future correspondence.

Some of the cookies used are persistent, which means that they remain stored on your device for 1 (one) year.

In some cases, service providers may provide you with custom content based on what you tell them about yourself, either directly or indirectly if you link a social media account. These types of cookies simply allow service providers to provide you with content that they feel may be of interest to you.

NOWNodes uses the following cookies:

Necessary cookies: help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies. (4 necessary cookies).

Preference cookies: enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in. (2 preference cookies).

Statistics cookies: help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. These cookies may register data on visitors' website-behavior, collect statistics on the user’s interaction with the real time price- and stock bar on the website. (3 statistics cookies).

Marketing: are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers. (2 marketing cookies).

These cookies may:

- determine if the visitor has any ad blocker software in their browser – this information can be used to make website content inaccessible to visitors if the website is financed with third-party advertisement,

- save information of actions that have been carried out by the user during the current visit to the website, including searches with keywords included,

- set a unique ID for the visitor, that allows third party advertisers to target the visitor with relevant

advertisements. **Unclassified cookies:** are cookies that we are in the process of classifying, together with

the providers of individual cookies. (1 unclassified cookie).

A lot of web browsers allow control of cookies through the settings. Users can prevent the setting of cookies by adjusting their browser settings. Be aware that disabling cookies will affect the functionality of most website. Disabling cookies will usually affect the functionality and certain features of sites.

LIMITATION OF LIABILITY

Please pay attention to the fact that NOWNodes does not process User payment, financial data. As is stated in our Service Agreement, we are service providers that don't track any other financial information.

NOWNodes does not handle any Personal data processing that arises from virtual transactions. In no way can NOWNodes be recognized as a data controller in this respect. NOWNodes does not have access to your financial; information, nor does it store it.

DATA SUBJECT'S RIGHTS

You have certain individual rights regarding the Personal data that we collect and process about you through the NOWNodes Website.

You have the right to access or receive certain data about the Personal data we process about you.

You also have the right to have your Personal data rectified, to object to the processing of your Personal data, or to ask us to restrict processing or delete your Personal data.

You also have the right to lodge a complaint with a supervisory authority against NOWNodes and withdraw your consent to Personal data processing, as well as ask for rectification of inaccurate data about you.

If the Data subject is intending to use one of the rights provided for in this paragraph of the Policy, the Data subject shall send an email to NOWNodes by using contact details of NOWNodes provided for in this Policy.

Once we receive any of your requests we will consider and decide on it within 1 month unless there is a justified requirement to provide such information faster. This term may be extended according to the applicable law. We may request specific information from you to confirm your identity when necessary and reasonable.

SECURITY AND PROTECTION OF PERSONAL DATA

We take reasonable administrative, physical, and electronic measures designed to safeguard and protect your Personal data from unauthorized access or disclosure. This includes utilizing Secure Sockets Layer (SSL) software, which encrypts the personal information you input, and storing your personal information in encrypted form behind a firewall designed to block access from outside our network. However, no security or encryption method can be guaranteed to protect information from hackers or human error, no computer security system is entirely foolproof, and the Internet is not a secure method of transmitting information.

We do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorized access or use of that information and we cannot and do not guarantee that personal information communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us. We cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your Information will not occur.

<u>We observe generally accepted standards to protect your information. We have taken at least the following measures:</u>

- We appoint a person who is responsible for the organization of Personal data processing
- We determine the list of employees having access to Personal data and require them to treat this information as confidential;
- We arrange the procedure for destruction of Personal data upon expiration of the term of their processing;
- We conduct internal audits of compliance with the requirements to ensure security of Personal data;
- We determine the procedure for responding to information security incidents;
- We test systems for vulnerabilities and security issues at least once every 12 months;
- Access to confidential data is protected, for example, through passwords or access tokens.
- The incident response processes are tested at least once every 12 months.
- NOWNodes ensures that the information security perimeter is protected by a security tool to filter website traffic, namely the Cloudflare Firewall (https://www.cloudflare.com/waf/), which keeps applications and APIs secure and productive, thwarts DDoS attacks, keeps bots at bay, detects anomalies and malicious payloads, all while monitoring for browser supply chain attacks.
- NOWNodes' servers are built on Linux (https://www.linux.org/), all servers are functioning properly within our control.

  We may take reasonable steps to protect our systems, Services and any data, which may include suspending access to any whole or part of the Services, without liability or fault for the purpose of restoring security.

  User shall be fully responsible for his/her API keys and password safety. NOWNodes cannot be held liable if this data is used by an unauthorized third party. User shall immediately notify NOWNodes of any cases of unauthorized access.

STORAGE OF PERSONAL DATA

We strive to limit the period of Personal data processing to the necessary minimum and not to store them for longer than is reasonably necessary.

Personal data we collect may be stored or processed on servers located in jurisdictions with adequate data protection standards.

We store your Personal data only for as long as is necessary for us to fulfill the purposes for which the data was collected, as set forth in this Privacy Policy, or, when applicable, as long as we are legally required to retain the Information, including, without limitation, for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to alter, amend or modify this Privacy Policy from time to time, in our sole discretion. We will provide you with notice of such changes by sending an e-mail, providing notice on the homepage of the Website and/or by posting the amended Privacy Policy via our Website and updating the "Last Updated" date at the top of this Privacy Policy. The amended Privacy Policy will be deemed effective immediately upon posting on the Website. Your continued use of the NOWNodes Website and/or our Services constitutes your agreement to be bound by any such changes to this Privacy Policy. If you do not agree with this Privacy Policy or any amendment to it, you should discontinue access and use of the NOWNodes Website and our Services.

CONTACT

If you have any questions relating to this Privacy Policy, your rights, and obligations and/or your use of the Website, or any other matter, please contact us at:

E-mail: ops@techcastle.co