

Privacy Policy

Garden Finance

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We at Garden Finance, including our affiliated entities, group companies or permitted assigns, ("Garden Finance", "Company" or "we") recognize that your privacy is very important and it is our endeavor to protect the data and privacy of every user ("User" or "You") in compliance with applicable laws and as per the details outlined in this privacy policy ("Privacy Policy"). Privacy Policy describes our policies and procedures on the collection, use, processing and disclosure of your information pursuant to your use of our website (www.garden.finance), assessed through desktop, mobile, browser extension or any other mode or method, mobile applications, desktop applications, products or services ("Online Platform") operated or offered by Garden Finance or receiving any services from us through the Online Platform ("Services"). This Privacy Policy is part of and is to be read along with the Terms of Service ('TOS') and other materials as available on our Online Platform.

We advise you to read this Privacy Policy and TOS before using our Platform, using any of our services or submitting any personal data. By using the Platform, it shall be deemed that you are expressly consenting to be bound by the terms and conditions described in this Privacy Policy and TOS. Please note that our services offered through the Platform are not intended for minors below the age of 18 years and we do not knowingly collect data relating to minors. This Privacy Policy is not applicable to any Personal Data collected offline or through third party entities or channels other than our Platform.

A. Introduction

We reserve our right to change and update this Privacy Policy from time to time, therefore, you should regularly check for any changes in our Privacy Policy. We will notify all users of any material changes to this Privacy Policy and the Privacy Policy document will also signify the date of last update for user's convenience. Your continued access to or use of our Platform and services after the date of the update in Privacy Policy constitutes your acknowledgment and agreement that you have read, understood and accepted the terms of the updated Privacy Policy. If you do not agree to the updated Privacy Policy, you must stop accessing or using our Platform and/or our Services.

B. What data we collect from you

We may collect and process the following data about you:

- **Wallet details:** Your wallet address (public key), publicly available details of transactions and other activities conducted through your wallet and details of balance and other funds available in your wallet;
- **Transaction details:** Details of your activities, all transactions, actions or tasks performed on or through our Platforms including transactions relating to deposit, withdrawal, swapping or transfer;

- **Technical information:** Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, location, browser plug-in types and versions, operating system and platform, material or information that you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-hovers), and methods used to browse away from the page;
- **Correspondence details:** You may provide us your name, email or any other details while participating in any survey, sales and marketing campaigns launched and conducted through social media and other platforms or when you correspond with us directly on our email id or any other contact details;
- **Cookies:** Our Platform uses cookies to keep the site secure and understand how visitors use our services. Please refer to Section J of this Privacy Policy for a full breakdown of cookies in use.

C. Use of your data

The data that we collect from or about you may be used and/or processed:

- to verify, maintain, update and retain details relating to your wallet address, transactions and other activities as may be required as per our policy or to comply with applicable laws and regulations;
- to facilitate and provide the services offered through our Platform;
- to inform you of our products, services, promotions, offers, surveys and events which may be of interest to you;
- to carry out update, upgrade, maintenance, customization and other changes in our products and services to serve you better;
- to provide you with the information and Services, that you request from us and to correspond with you to share the requested information or take any other action as may be required;
- to enhance the security and user experience of our Platform;
- to track and remember information and details relating to the transactions executed by you on or through our Platform;
- to send you service related notices or emails and other non-essential promotional material (you will be provided an option to unsubscribe to such email or other communications);
- to understand how users discover and navigate our Platform, and to improve our marketing, product experience, and user journeys using anonymous, aggregated data.

D. Disclosure and sharing of your data

We reserve the right to share any data that we collect from you, as prescribed above with our affiliates and third party service providers. Your personal data may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your personal data under relevant foreign laws. You acknowledge that the privacy standards of those countries may be lower than those followed in your country of residence.

We further reserve the right to share your personal data to any third party when we are under obligation to share such information under applicable laws or under the order of any competent authority/court.

E. Your Consent

By using any of the Platform, you agree and consent to the collection and use of data collected to the extent and in the manner described above and in accordance with this Privacy Policy.

Where you choose to accept cookies via our cookie consent banner, you consent to the processing of anonymous usage data collected through those cookies. This data is used solely to improve the performance, security, and user experience of our Platform, and to better understand how our services are discovered and used. We never collect personally identifiable information through cookies.

You also agree and consent to any changes made to this Privacy Policy in due course. We will notify users of any material changes to this Privacy Policy before they take effect.

If you do not agree with the terms and conditions of this Privacy Policy, please do not provide any information to us.

You also agree that all your data and/or information shared with us is accurate, correct and complete, at all times. You understand that you must promptly inform us of any changes to your data and/or information which may impact your use of our Platform.

F. Assignment

We may assign, novate, or transfer any or all rights and obligations that accrued in our favor under this Privacy Policy, at our sole discretion, to our subsidiaries, affiliated entities or selected Third Parties to offer you a suite of services through the Platform.

G. Data Security

We store our data on third party hosting service providers which follow reasonable and robust security standards. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee, give no warranties, and shall not be liable for breach of the security of your data transmitted through the Platform due to malicious attacks, errors, commission or omissions not willfully initiated by us. Any transmission is at your own risk. Once we have received your information, we will use reasonable standards and practices to enforce strict physical, electronic, and procedural safeguards to try to prevent any unauthorized access.

H. Data Retention

We may, at our sole discretion, retain any information and/or data provided by you for as long as your Account is active, and even subsequently, for resolution of any disputes, for enforcement of any agreements, and/or as necessitated under applicable laws.

We make no warranties and shall not be liable regarding non-availability or non-retention of any information and/or data provided by you beyond the deletion of your Account.

I. Data Retention Period

We will retain your personal data for a period of 5 years after the end of the relationship between us as a company and you as a user. This period may be further extended in certain cases.

J. Cookies

Our Platform uses cookies to keep the site secure and to understand how visitors discover and interact with Garden at an anonymous, aggregated level. We never collect personally identifiable information through cookies. You can manage your cookie preferences via the cookie banner on the Platform or by clicking the cookie settings link in the footer at any time.

Essential Cookies — always active, required for the site to function securely.

Cookie	Provider	Purpose
cf_clearance	Cloudflare	Bot and DDoS protection. Confirms a visitor has passed a security challenge.

Performance & Functional Cookies — only set with your consent.

Cookie	Provider	Purpose
ph_phc_*	PostHog	Anonymous session and product analytics via a first-party reverse proxy.
_clck	Microsoft Clarity	Persistent visitor ID for heatmaps and session replays.
_clsk	Microsoft Clarity	Stitches page views from one visit into a single session recording.

Analytics & Customization Cookies — only set with your consent.

Cookie	Provider	Purpose
_ga	Google Analytics 4	Anonymous client ID for traffic and engagement metrics.
_ga_T4V5T77D9M	Google Analytics 4	Session state and session count for this GA4 property.
original_referrer	Garden (Custom)	Records the referring website from a user's first visit.
original_landing_url	Garden (Custom)	Records the first landing page URL including UTM parameters.

For more information on how third-party providers handle data: Google (policies.google.com), PostHog (posthog.com/privacy), Microsoft (privacy.microsoft.com), Cloudflare (cloudflare.com/privacypolicy).

K. Your Rights

If you are located in the European Union, United Kingdom, or another jurisdiction with applicable data protection laws, you may have the following rights:

- Right to access the personal data we hold about you

- Right to request correction of inaccurate data
- Right to request deletion of your data
- Right to object to or restrict processing
- Right to withdraw consent at any time without affecting the lawfulness of prior processing
- Right to lodge a complaint with your local data protection authority

To exercise any of these rights, please contact us at hello@garden.finance.