

PAWN BOTS PRIVACY POLICY

Last Updated: August 2022

Mainframe Group Inc. (collectively, "Pawn Bots", "we", "us," "our") is committed to protecting individual privacy and maintaining the trust of users of our Pawn Bots platform and services (collectively, "Users"). It is important to us that we provide transparency regarding our collection, use, and disclosure of the personal information of Users. This includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. We refer to this information as "personal information" throughout this Privacy Policy ("Policy").

To help us meet our commitment to protecting your personal information, we have created this Policy. This Policy governs data protection matters related to the digital assets platform offered by Pawn Bots (collectively, the "Platform"). This Privacy Policy, along with our Terms of Use, form an integral and binding part of our relationship with you.

By providing personal information to us or by using our Platform, you agree to our collection, use, disclosure, and storage of personal information as described in this Privacy Policy. This Policy describes how we use, share, and protect the personal information of individuals who use our Platform. It also describes your rights and choices regarding the use, access to, and correction of personal information.

1. Scope of Privacy Policy

This Policy describes how we use, share, and protect the personal information of our Users. It also describes the rights and choices regarding use, access to, and correction of personal information available.

2. Collection of Personal Information

Here is a list of the categories of personal information we may collect and process.

Information You Provide Us

We collect personal information that you voluntarily submit to us, including when you communicate with us via our Platform and emails or sign up to join the community. Such personal information includes your name, email address, Discord username, Twitter username, and MetaMask Wallet Address. If you provide us feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply. For example, if you request information from us via our "Contact Us" form, information such as your name, email address, phone number, and other contents of your message will be collected. This includes any text characters and any audio, video, and graphic information formats included in the message. If you provide us feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.

We may also collect personal information at other points on our Platform that explicitly states that personal information is being collected from you. Pawn Bots will disclose the purposes of collecting your

personal information accordingly. Pawn Bots will only use your personal information for the purposes for which it has been collected from you.

Pawn Bots gives you choices about the ways we collect, use, and share your personal information. However, if you choose not to provide certain details, some of your experiences with us may be affected. If at any point in time you wish to know what personal information we process about you, you can request to access the information by contacting us at contact@pawnbots.finance.

3. Use of Personal Information

In general, personal information you submit to us is used either to respond to requests that you make or to aid us in serving you better. We use your personal information in the following ways:

- Provide you with customer support;
- Market our products to you;
- Send you administrative notifications, such as security or support and maintenance advisories; and
- Send you notifications related to actions on the Platform.

Subject to applicable laws and regulations, we may from time to time send direct marketing materials promoting services, products, facilities, or activities to you using information collected from or about you. You may opt out of such communications at any time by contacting us via email at contact@pawnbots.finance. You may also opt out of such communications by following the directions provided in any marketing communication. It is our policy to not provide your personal information for those third parties' direct marketing purposes without your consent.

4. Disclosure of Personal Information

We will not disclose any personal information we collect from you to any third parties except as indicated below:

- **Service Providers** - We may share your personal information with third-party service providers for business or commercial purposes. Your personal information may be shared so that they can provide us with services, including customer support, data analytics, advertising, marketing, and data processing. We share your personal information with these service providers only so that they can provide us with services, and we prohibit our service providers from using or disclosing your personal information for any other purpose. Our third-party service providers are subject to strict confidentiality obligations.
- **Affiliates** - We may share your personal information with our affiliates, for the purposes outlined above, and as it is necessary to provide you with our Platform.
- **Professional Advisors** - We may share your personal information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.
- **Law Enforcement and Legal Request** – We may disclose personal information to comply with applicable legal and our regulatory monitoring and reporting obligations (which may include laws outside your country of residence), to respond to requests from public and government authorities (which may include authorities outside your country of residence), to cooperate with law enforcement, or for other legal reasons.

- **Business Transfer** – We may disclose personal information to a buyer or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Pawn Bots’ assets, whether as a going concern or as part of bankruptcy, liquidation, receivership, or similar proceeding in which personal information held by Pawn Bots are among the assets to be transferred.
- **Enforcement of Our or Others’ Rights** – We may disclose personal information to the extent they are necessary to enforce or protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others, including enforcing our Terms of Use and any other agreements (such as for billing and collection purposes and fraud prevention).

5. Personal Information of Minors

We do not knowingly collect personal information from children under the age of eighteen (18) without authorization by a holder of parental responsibility. If you believe that we may have collected personal information from or about a child under the age of eighteen (18) without such authorization, please contact us at contact@pawnbots.finance.

6. Protection of Personal Information

We take the protection of your personal information seriously. Pawn Bots employees who have access to your personal information are made aware of the importance of keeping it confidential. We care about the security of the information and use various administrative, and technological safeguards to preserve the integrity and security of all information collected through our Platform.

When we rely on service providers that may require access to your personal information, we require them to have adequate privacy and security standards. We use contracts and other legally binding measures with our service providers to maintain the confidentiality and security of your personal information and to prevent such information from being used for any other purpose.

However, no data security measures can guarantee complete security; we also depend on you to take common-sense steps to ensure your personal information remains secure. Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Platform.

7. Information for California Consumers

This section of our Privacy Policy is specifically for California residents and explains how we collect, use, and disclose personal information relating to California residents covered by the California Consumer Privacy Act (“CCPA”). The CCPA defines “personal information” as any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household. Pawn Bots does not sell, trade, or rent out our User’s personal information for compensation, nor have we done so in the preceding twelve (12) months. California residents are entitled to contact us to request information about whether we have disclosed personal information to third parties for the third parties’ direct marketing purposes. Currently, Pawn Bots does not disclose personal information to third parties for direct marketing purposes. Thus, upon receipt of such a request by a California consumer, and as required by California state law, we will either

(1) respond with a confirmation that we have not disclosed any personal information to third parties in the previous calendar year, or (2) if our practices have changed, we will provide the categories of personal information that has been shared in the past twelve (12) months and categories of third parties to whom such personal information was disclosed, whichever is relevant.

Your California Rights

California consumers have the right to:

- Request disclosure of the categories and specific pieces of personal information that Pawn Bots has collected about you;
- Request disclosure of the categories of third-party sources, if any, from which Pawn Bots has collected personal information about you;
- Disclosure of the business or commercial purpose(s) for which your personal information has been collected by Pawn Bots;
- Receive a list of the categories of third parties with whom Pawn Bots has shared your personal information;
- Request that Pawn Bots delete any personal information that it has collected from you (subject to exceptions); and
- Not be discriminated against by Pawn Bots (e.g., charged different rates, provided different levels of service, denied goods or services, or suggested any of the preceding) for exercising any of the individual rights granted above.

To exercise any of your rights as a California consumer, you can submit a request to contact@pawnbots.finance.

Before complying with your request, we will need to verify that it is you that is making the request. To accomplish this, you may be requested to (1) confirm specific personal information that we already know about you; or (2) provide us with appropriate identification and documentation. California consumers are limited to two requests for personal information per twelve (12) month period. Only you or an authorized agent may make a verifiable data subject request related to your personal information. The verifiable data subject request must provide sufficient information and documentation to allow us to verify that you (or an authorized agent) are the person about whom we collected personal information. We will not provide you with personal information if we cannot verify your identity and/or authority to make the data subject request and confirm the personal information belongs to you or the represented individual. Making a verifiable data subject request does not require you to create an account with us. We use personal information provided in a verifiable data subject request solely to verify the requestor's identity or authority to make the request.

We will acknowledge receipt of your data request within 10 days. We will respond to a verifiable data subject request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period. If you have an account with us, we will deliver our response to the email address for that account. If you do not have an account with us, we will deliver our response by US mail or electronically at the email address in your request, at your option. All disclosures we provide will only cover the twelve (12) month period preceding the verifiable employee request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable data subject request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will

tell you why we made that decision and provide you with a cost estimate before completing your request.

8. Information for EU Residents

This section of the Policy applies only to users who use the Platform from a country that is a Member State of the European Union ("EU Users") and supplements the information in the Privacy Policy.

Pawn Bots is the data controller for the processing of personal information or personal data as defined Under applicable data protection law. For purposes of this Policy, personal information and personal data are used synonymously.

Under the General Data Protection Regulation ("GDPR") (and subject to any relevant exceptions) you have the right to access, correct, change, delete, restrict, exercise your right to data portability, or object to the processing of personal information.

Legal Basis for Processing

We process personal information for the purposes set out in this Privacy Policy, as described above. Our legal bases to process personal information includes processing that is:

- Necessary for the performance of the contract between you and Pawn Bots (for example, to provide you with the products and services you request);
- Necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement);
- Necessary for our legitimate interests (for example, to manage our relationship with you and to improve the Websites and our products and services); and
- Based on consent by our customers (for example, to communicate with you about our products and services and provide you with marketing information), which may subsequently be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.

You are not required, as a necessity to enter into a contract, to provide us with personal information for processing as described above.

Your EU Rights

As an individual residing in, or located in, the European Union or European Economic Area, you can exercise your GDPR rights. We may first request verification of your identity prior to facilitating the exercise of your rights.

If you wish to confirm that Pawn Bots is processing your personal information, or to have access to the personal information Pawn Bots may have about you, please contact us at contact@pawnbots.finance.

You may also request information about: the purpose of the processing; the categories of personal information concerned; who else outside Pawn Bots might have received the data from Pawn Bots; what the source of the information was (if you didn't provide it directly to Pawn Bots); and how long it will be stored. You have a right to correct (rectify) the record of your personal information maintained by Pawn Bots if it is inaccurate. You may request that Pawn Bots erase that data or cease processing it, subject to certain exceptions. You may also request that we cease using your data for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how Pawn Bots processes your personal information. When technically feasible, Pawn Bots will—at your request—provide your personal information to you or transmit it directly to another controller.

Reasonable access to your personal information will be provided at no cost upon request made to the Pawn Bots at contact@pawnbots.finance. If access cannot be provided within a reasonable time frame, then we will provide you with a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied.

For questions or complaints concerning the processing of your personal information, you can email us at contact@pawnbots.finance. Alternatively, if you are located in the European Union, you can also have recourse to the European Data Protection Supervisor or with your nation's data protection authority.

9. Retention of Personal Information

We retain personal information for as long as needed or permitted in light of the purpose(s) for which they were obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Platform to you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

10. Updates to this Privacy Policy

It is our intent to post any changes we make to our Privacy Policy on this page, with a notice that it has been updated on our main homepage. If we make material changes to how we treat your personal information, we will notify you through a notice on the homepage. The date that this Privacy Policy was last revised is listed at the top of the page. You are responsible for visiting our website and this Privacy Policy to check for any changes.

11. Updating Your Information and Contacting Us

If you have any questions or complaints related to our practices with respect to the collection, use, or disclosure of personal information, or if you would like to update your information, please contact us at contact@pawnbots.finance.