

PRIVACY POLICY

Last updated June, 2026

Thank you for choosing to be part of our community at RealFi Foundation (together with our subsidiaries and affiliates, “RealFi”, “we”, “us”, or “our”). This Privacy Policy applies to all personal information collected through the RealFi website, the RealFi testnet, and the RealFi decentralized application (the “dApp”), together with our related websites, products, services, sales, marketing, and events, and any related interfaces, plug-ins, and browser extensions (collectively, the “Products”) (the “Privacy Policy”). This Privacy Policy describes how RealFi collects, stores, uses, discloses and protects your Personal Data when you use our Products.

We are committed to processing your personal information in accordance with applicable data protection laws, including the Cayman Islands Data Protection Act, 2021 (“Cayman DPA”) and the British Virgin Islands Data Protection Act, 2021 (“BVI DPA”) (the Cayman DPA and BVI DPA are collectively referred to as the “DPAs”).

When you access or use our Products, you trust us with your personal information. In this Privacy Policy, we describe how we collect, use, store and share your personal information and what rights you have in relation to it. If there are any terms in this Privacy Policy that you do not agree with, please discontinue access and use of our Products.

By using our website(s) or our Products, you accept the terms of this Privacy Policy, and consent to our collection, use, disclosure and retention of your personal data as described in this Privacy Policy. If you do not agree with any part of this Privacy Policy then you may not use our website(s) or our Products.

Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. Collection of Data

RealFi collects several types of information for various purposes to provide and improve the Products for your use.

Types of Data Collected

- Personal Data

While using the Products, RealFi may ask you to provide certain personally identifiable information that can be used to contact or identify you (“personal data” or “personal information”), which may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

Your personal data may be used to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications by following the unsubscribe link or instructions provided in any email sent to you by RealFi. You are responsible for ensuring that any personal data you provide is accurate, complete, and up to date.

- Usage Information

Usage Information refers to information collected from Products such as what action has been applied to Products such as clicking logs; your registration details or how you may be using Products.

Blockchain and Wallet Data. When you connect a wallet or transact through the Products, RealFi processes your public wallet address, on-chain transaction data, and cryptographic signatures.

Transactions recorded on a public blockchain are visible to anyone and are permanent, and RealFi cannot alter or delete them. RealFi does not take control of your private keys.

Identity Verification and Compliance Data. RealFi or its outsourced service providers collect identity and verification information in accordance with RealFi's AML Policies and Procedures, and comply with sanctions and eligibility obligations. This may include your name, date of birth, nationality, government-issued identification, proof of address, and the results of sanctions and politically-exposed-person screening.

Eligibility and Location Data. RealFi collects IP addresses, approximate location, and jurisdiction information, and may ask you to confirm your jurisdiction, to determine whether you are permitted to access the Products.

Device and Log Data. RealFi automatically collects device, browser, and log information, including IP addresses, device identifiers, access times, and the pages or features you use.

Points Program data. Points balances and history, season tags, multipliers, referral relationships, account integrity status (Active / Suspicious / Malicious), vesting snapshot results generated by the points engine and integrity systems

2. How We Use Your Information

RealFi uses Personal Data to operate and improve the Products; to process minting, redemption, yield, and treasury operations; to verify identity and eligibility and to meet anti-money-laundering, sanctions, and other legal obligations; to prevent fraud and secure the Products; to communicate with you, including service messages and, where you have opted in, marketing; and to comply with applicable law and enforceable requests.

3. How We Share Your Information

RealFi shares personal information with service providers that operate the Products on our behalf, including compliance and onboarding, custody, cloud hosting, blockchain analytics, and communications providers, each bound by confidentiality and data-protection obligations; with regulators, law enforcement, and other authorities where required or permitted by law; with our affiliates; and in connection with a corporate transaction such as a financing, merger, or sale of assets. RealFi does not sell your personal information and does not use advertising or targeting cookies. Keep in mind that any data collected by third party providers is subject to those third parties' privacy policies.

4. Public Blockchain Data

The Products interact with public blockchains. Wallet addresses, transaction amounts, and related on-chain data are public, can be linked to you, and cannot be changed or removed by RealFi. Consider this before you transact.

5. Eligibility and Restricted Jurisdictions

The Products are not offered to persons that are owned or controlled by, or acting on behalf of or for the benefit of, any person that is, the subject or target of any sanctions administered or enforced by the U.S. Department of Treasury's Office of Foreign Assets Control ("**OFAC**"), the United Nations Security Council, the European Union, or His Majesty's Treasury of the United Kingdom (including as extended to the British Virgin Islands), or any other applicable sanctions authority, or located in the European Union, Hong Kong, the United Kingdom, the United States, or a jurisdiction which is subject to sanctions or embargoes administered or enforced by OFAC, the United Nations Security Council, the European Union, or His Majesty's Treasury of the United Kingdom (including as extended to the British Virgin Islands), or any other applicable sanctions authority, as updated from time to time. RealFi uses the eligibility and location data described above to enforce these restrictions, and may decline or discontinue access accordingly and without prior notice.

6. International Transfers

RealFi Foundation is established in the Cayman Islands and uses service providers in other locations, including Singapore. Your personal information may be processed in jurisdictions whose data-protection laws differ from those of your own. RealFi takes steps to protect your information consistent with this Policy wherever it is processed. Whenever we transfer your personal data internationally, we will take reasonable steps to ensure that your information is treated securely and in accordance with this Privacy Policy and applicable law.

7. Data Retention

RealFi keeps personal information for as long as needed for the purposes in this Policy and to meet legal, regulatory, accounting, and reporting obligations, which may require retention for several years after your relationship with RealFi ends. On-chain data persists independently of RealFi and cannot be deleted or altered by RealFi.

8. Security

RealFi maintains administrative, technical, and organizational safeguards designed to protect personal information. No method of transmission or storage is completely secure, and RealFi cannot guarantee absolute security. In the event of a breach involving your personal data, we will notify you and applicable authorities without undue delay, as required by applicable law. We will take all appropriate steps to remedy any security issue and mitigate any potential harm.

9. Your Rights

Subject to applicable law, you may request access to, correction of, or deletion of your personal information, and may object to or restrict certain processing. You are also able to complain to the relevant competent authorities about alleged violations of the DPAs. Some information must be retained to meet legal and regulatory obligations, and on-chain data cannot be deleted. To exercise a right, contact RealFi using the details below. Note that some data (for example anti-sybil records) must be retained to operate the RealFi Points Program lawfully and fairly, and objection to integrity processing may make participation in the RealFi Points Program impossible.

10. Children

The Products are not directed to, and RealFi does not knowingly collect personal information from, anyone under the age of eighteen or the age of majority in their jurisdiction.

11. Cookies

RealFi uses cookies and similar technologies as described in the RealFi Cookie Policy, which forms part of this Privacy Policy.

12. Changes to this Policy

RealFi may update this Privacy Policy from time to time. The date at the top shows when it was last revised. Material changes will be notified through the Products or by other appropriate means.

13. Contact Us

For questions about this Privacy Policy or to exercise your rights, contact RealFi Foundation, c/o Walkers Corporate Limited, 190 Elgin Avenue, George Town, Grand Cayman KY1-9008, Cayman Islands, or email compliance@realfi.co.