

Privacy Policy

MakaWallet

Effective Date: May 11, 2026

This Privacy Policy describes how Maka Foundation, a foundation company organized under the laws of the Cayman Islands ("Maka," "we," "us," or "our"), collects, uses, discloses, and protects information in connection with MakaWallet, the websites at makawallet.io and related subdomains, our mobile applications, browser extensions, and related services (collectively, the "Wallet" or "Services").

MakaWallet is a non-custodial self-custody wallet. We do not control your Private Keys, recovery phrase, or digital assets, and we do not have access to them. However, when you use our websites, applications, support channels, or optional services, we may process limited personal information as described below.

1. Information We Collect

1.1 Information You Provide Directly

- **Support and communications:** When you contact us (for example, by email, support form, or community channel), we collect the information you provide, such as your name, email address, the content of your message, attachments, and any identifiers (such as wallet address) you share with us.
- **Optional accounts and feature opt-ins:** If we offer features that require an account, newsletter, beta program, or opt-in (such as marketing emails or push notifications), we collect the information you provide to register or subscribe.
- **Surveys, research, and events:** If you participate in user research, surveys, contests, or events, we collect the information you choose to share.

1.2 Information Collected Automatically

- **Device and technical data:** Such as device type, operating system, application version, language, time zone, screen resolution, and crash logs.
- **Network and connection data:** Such as IP address (which we may truncate or anonymize), general approximate location derived from IP, and information about your internet service provider.
- **Usage data:** Such as pages and screens viewed, features used, buttons clicked, referrer URL, timestamps, and aggregated interaction metrics. We aim to minimize and, where feasible, anonymize or aggregate such data.

- **Cookies and similar technologies:** On our websites, we may use cookies, local storage, and similar technologies. See Section 8.

1.3 Public Blockchain Data

When you transact on the MakaChain network or any other blockchain through the Wallet, your transactions, wallet addresses, balances, and transaction history are recorded on the public blockchain. This information is publicly available, is not controlled by us, and cannot be modified or deleted by us. Blockchain data may, in some circumstances, be combined with other information to identify you. We may query public blockchain data in order to display balances, transaction history, and other features in the Wallet.

1.4 Information from Third Parties

- **Service providers:** We may receive information from analytics, error-monitoring, infrastructure, customer-support, anti-fraud, and security providers.
- **Integrated Third-Party Services:** When you connect to or use a Third-Party Service through the Wallet (such as a fiat on-ramp, swap provider, or dApp), that service may share information with us as needed to provide the integration. Their use of your information is governed by their own privacy policies.
- **Public sources and chain analytics:** We may obtain information from public sources and blockchain analytics providers in order to comply with law, prevent fraud, and assess sanctions exposure (for example, to screen addresses against OFAC and other sanctions lists).

1.5 What We Do Not Collect

We do not collect, store, or have access to your Private Keys, recovery phrase, password, biometric credentials, or any other credentials you use to control your accounts. Anyone asking for these is attempting to defraud you.

2. How We Use Information

We use information for the following purposes:

- **Provide and operate the Services** — including loading balances and transaction history, displaying network data, and enabling Wallet features.
- **Maintain security and integrity** — detect, investigate, and prevent fraud, abuse, security incidents, and unauthorized use; protect users and our infrastructure.
- **Improve and develop the Services** — understand usage patterns, debug, run experiments, and develop new features.

- **Communicate with you** — respond to your inquiries, provide support, send technical notices, security alerts, and administrative messages, and, with your consent where required, marketing and educational communications.
- **Compliance and legal** — comply with applicable laws, regulations, sanctions screening obligations, law-enforcement requests, court orders, and our legal rights and obligations.
- **Aggregated and de-identified data** — we may create de-identified or aggregated data for any lawful purpose, including research, benchmarking, and publishing statistics about Wallet usage.

3. Legal Bases for Processing (EEA, UK, and Similar Jurisdictions)

Where the General Data Protection Regulation (GDPR), UK GDPR, or similar laws apply, we process personal data on the following legal bases:

- **Performance of a contract** — to provide the Wallet you have requested.
- **Legitimate interests** — to operate, secure, and improve the Services; prevent fraud and abuse; communicate with users; and exercise legal rights, provided such interests are not overridden by your rights.
- **Consent** — for marketing communications, non-essential cookies, and other processing where required by law. You may withdraw consent at any time.
- **Legal obligation** — to comply with applicable laws, including sanctions, tax, and law-enforcement obligations.

4. How We Share Information

We do not sell personal information. We may share information in the following limited circumstances:

- **Service providers:** With vendors and contractors that provide hosting, analytics, error monitoring, communications, customer support, security, compliance screening, and similar services, subject to confidentiality and data-protection obligations.
- **Third-Party Services you choose to use:** When you connect to or use a Third-Party Service through the Wallet, information necessary to that connection (such as your wallet address) will be shared with that service.
- **Legal, safety, and compliance:** To comply with applicable law, regulation, legal process, or governmental request; to enforce our Terms; to address fraud, security, or technical issues; and to protect the rights, property, or safety of Maka, our users, or others.

- **Business transfers:** In connection with a merger, acquisition, restructuring, financing, or sale of assets, information may be transferred to the relevant party.
- **With your consent:** For any other purpose disclosed to you and to which you consent.

5. International Data Transfers

We operate internationally and may transfer, store, and process information in the Cayman Islands, the United States, the European Economic Area, the United Kingdom, and other jurisdictions whose data-protection laws may differ from those in your country. Where required by law, we use appropriate safeguards for cross-border transfers, such as standard contractual clauses, vendor due diligence, and supplementary measures.

6. Data Retention

We retain personal information only for as long as needed for the purposes described in this Policy, including to provide the Services, comply with our legal obligations, resolve disputes, and enforce our agreements. Retention periods vary based on the type of information and purpose. When information is no longer needed, we delete, anonymize, or aggregate it. We cannot delete information recorded on public blockchains.

7. Your Rights and Choices

Depending on your jurisdiction, you may have rights with respect to your personal information, including:

- Right to access the personal information we hold about you;
- Right to correct inaccurate or incomplete information;
- Right to delete personal information, subject to legal exceptions;
- Right to restrict or object to processing;
- Right to data portability;
- Right to withdraw consent (without affecting prior processing); and
- Right to lodge a complaint with a supervisory authority.

To exercise these rights, contact us at privacy@makawallet.io. We will respond consistent with applicable law. We may need to verify your identity before responding. Because the Wallet is non-custodial and we do not control your blockchain accounts, certain rights (for example, deletion of on-chain data) cannot be fulfilled by us.

California residents: Subject to the California Consumer Privacy Act, as amended (CCPA/CPRA), you have additional rights, including the right to know what personal information we collect and how it is used and shared, the right to delete personal information, the right to

correct inaccurate information, and the right to opt out of certain sharing or "sales." We do not sell personal information as that term is commonly understood. To exercise these rights, contact us at privacy@makawallet.io.

8. Cookies and Similar Technologies

On our websites, we may use strictly necessary cookies (required to operate the site), functional cookies (to remember preferences), analytics cookies (to understand usage), and, where applicable, marketing cookies. You can control cookies through your browser settings and, where required by law, through an in-site consent banner. Disabling cookies may affect site functionality. The Wallet mobile applications generally do not use cookies but may use comparable on-device storage.

9. Security

We implement administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, disclosure, alteration, and destruction, including encryption in transit, access controls, vendor due diligence, and security monitoring. However, no system is completely secure. You are responsible for keeping your device and credentials secure and for safeguarding your Private Keys and recovery phrase, which we cannot access or recover.

10. Children

The Wallet is not directed to, and we do not knowingly collect personal information from, individuals under the age of 18 (or the age of majority in your jurisdiction). If you believe a minor has provided personal information to us, please contact us, and we will take steps to delete such information.

11. Third-Party Links and Services

The Wallet and our websites may contain links to or integrations with third-party websites, applications, or services that we do not control. This Policy does not apply to those third parties, and we are not responsible for their content, privacy practices, or services. We encourage you to review their privacy policies.

12. Automated Decision-Making

We may use automated tools to detect fraud, abuse, sanctions exposure, and security risks. We do not use solely automated decision-making that produces legal or similarly significant effects on you without human review where required by law.

13. Changes to This Policy

We may update this Policy from time to time. If we make material changes, we will provide notice (for example, by posting an updated Policy on our website or in the Wallet) and update the "Effective Date" above. Your continued use of the Wallet after changes take effect constitutes your acceptance of the updated Policy.

14. Contact

Maka Foundation

Privacy contact: privacy@makawallet.io

Cayman Islands

Web: <https://makawallet.io>