

PRIVACY NOTICE

Effective Date: January 19, 2026

Last Updated: May 1, 2026

1. Overview

This Privacy Notice explains how personal information is collected, used, and protected when you access or use the Platform.

2. Platform Context

MakaPay is an application that enables interaction with the Maka Blockchain. For administrative purposes, the Platform is supported and maintained by Maka Foundation, a Cayman Islands foundation.

3. Information Collected

The Platform may collect limited personal information such as your name, email address, IP address, and device or browser information. This information is used to operate the Platform, communicate with users, enhance security, and meet legal obligations.

There is no custody of funds at all at MakaPay, and no financial assets, private keys, seed phrases, wallet passwords, or transaction signing credentials are collected or stored by the Platform.

4. Use of Information

Personal information is used solely to provide and improve the Platform, respond to inquiries, maintain security, and ensure operational integrity.

5. Information Sharing

Personal information is not sold. It may be shared with service providers supporting hosting, analytics, or security functions, or where required by law or necessary to protect the rights and safety of users or the Platform.

6. Blockchain Transparency

Transactions executed on the Maka Blockchain are publicly visible on the blockchain. This transparency is an inherent feature of blockchain technology and is not controlled or moderated by the Platform.

7. Data Security and Retention

Reasonable administrative and technical safeguards are used to protect personal information. Data is retained only for as long as necessary to fulfill legitimate business or legal purposes.

8. User Rights

Depending on your jurisdiction, you may have rights to access, correct, or request deletion of your personal information. Requests may be submitted to privacy@makapay.io

9. Children's Privacy

The Platform is not intended for individuals under the age of 18.

10. Updates

This Privacy Notice may be updated periodically and will be posted on the Platform.

11. EU Digital Services Act (DSA) – Trader Status and Data Practices

This section is added to clarify the Platform's position under the European Union's Digital Services Act ("DSA") and related guidance issued by the European Commission concerning the classification of online actors as "traders."

MakaPay is a non-custodial software interface that enables users to interact with the Maka Blockchain. MakaPay is not a marketplace, exchange, brokerage, or commercial seller of goods or services to consumers within the meaning of the DSA, and the EU's trader-identification and trader-traceability rules do not apply to MakaPay for the following reasons:

- MakaPay does not engage in trading activities and does not buy, sell, broker, or match transactions in digital assets, securities, commodities, or other financial instruments. It is not comparable to centralized service providers such as Coinbase, Binance, Kraken, or similar entities.
- MakaPay does not host third-party traders, sellers, or merchants, and does not allow consumers to enter into commercial transactions with traders through the Platform.
- MakaPay does not generate revenue from in-app purchases, paid features, advertising, commissions, spreads, trading fees, or other consumer-commerce monetization within the meaning of the DSA or the European Commission's related guidance.
- There is no custody of funds at all at MakaPay, and no financial assets, private keys, seed phrases, wallet passwords, or transaction signing credentials are collected, processed, or stored by the Platform.

Because MakaPay does not act as a trader and does not host traders or consumer-commerce activity, the Platform does not collect, process, or publish trader-identification information (such as trader names, addresses, registration numbers, or self-certification statements) under the DSA. The limited personal information described in Section 3 above is collected solely for the operational, security, communication, and legal-compliance purposes described in this Privacy Notice, and not for trader-classification purposes.

For users located in the European Union, the General Data Protection Regulation ("GDPR") and any applicable national data-protection laws continue to govern the processing of personal information described in this Notice. This Section 11 is informational and general in nature and does not constitute legal advice. Users with questions about their own status under the DSA, GDPR, or any other regulatory framework should consult their own legal advisors.