

PRIVACY POLICY

Effective Date: February 1, 2025

We, the **XONO FINANCE INC.** team (hereinafter "Xono Finance," "we," "our," or "us"), respect your privacy and are committed to protecting it through our compliance with this Privacy Policy. Xono Finance is a corporation organized under the laws of the State of Delaware, United States.

This Privacy Policy describes how we collect, use, disclose, and safeguard your personal information when you visit our website at [insert domain] (the "Website") and/or use our services (collectively, the "Services").

By using our Website and Services, you explicitly consent to the collection, use, and disclosure of your information as described in this Privacy Policy, as well as to the use of Cookies and other tracking technologies.

If you do not agree with the terms of this Privacy Policy, please do not access or use the Website or Services.

PREAMBLE

This Privacy Policy is provided in accordance with applicable United States federal laws (including, but not limited to, the Gramm-Leach-Bliley Act (GLBA), California Consumer Privacy Act (CCPA), and other state-specific privacy regulations) and Delaware law.

You acknowledge that by using our Website and Services, you are agreeing to the collection, use, and disclosure of your information as outlined herein.

We reserve the right to update this Privacy Policy from time to time. Changes will be posted on this page, with the updated revision date. Continued use of the Website or Services after such changes constitutes your consent to the updated Privacy Policy.

INFORMATION WE COLLECT

1. Personal Information

We may collect information that identifies or relates to you personally ("Personal Information"). This may include:

- Full name
- Email address
- Mailing address

- Phone number
- Career and financial interests
- KYC and AML-related documentation (as required by law)
- Any other information you voluntarily provide to us through forms, registration, or communication.

2. Non-Personal Information

We collect aggregated and non-identifying information related to your use of the Website ("Non-Personal Information"), which may include:

- Device type and identifiers
- Browser type and settings
- IP address
- Location (based on IP address)
- Browsing behavior (pages viewed, time on site, etc.)
- Cookies and tracking technologies (see below)

Note: While IP addresses are collected, they are not used by Xono Finance to identify individual users.

HOW WE USE YOUR INFORMATION

Personal Information

We use Personal Information solely for legitimate business purposes, which may include:

- Processing inquiries and registrations
- Performing Know Your Customer (KYC) and Anti-Money Laundering (AML) checks (as required by U.S. law, including the Bank Secrecy Act (BSA))
- Providing services and customer support
- Communicating updates about services
- Complying with applicable laws and regulations

We may share your Personal Information with:

- Subsidiaries and affiliates under common control
- Third-party service providers who support our KYC/AML compliance efforts
- Regulatory bodies and law enforcement, when required by law
- In connection with a merger, acquisition, or sale of all or part of our business (subject to confidentiality obligations)

We do not sell your Personal Information to third parties, as defined by applicable U.S. privacy laws, including the CCPA.

Non-Personal Information

We use Non-Personal Information to:

- Analyze usage patterns and improve our Website
- Customize the user experience
- Conduct internal reporting and analysis
- Provide aggregated statistics to potential partners and affiliates

DATA RETENTION

As a regulated AML entity under U.S. law, we retain Personal Information collected for five (5) years after the termination of a business relationship, as required by the BSA and FinCEN guidelines.

Your Rights and Choices

Depending on your state of residence (for example, California, Virginia, or Colorado), you may have the following rights:

- The right to access the Personal Information we collect about you
- The right to request deletion of your Personal Information (subject to legal exceptions)
- The right to opt-out of the sale or sharing of your Personal Information (even though we do not sell your data)
- The right to non-discrimination for exercising your privacy rights

To exercise your rights, please contact us at support@xono.finance.

If you are a California resident, additional disclosures under the CCPA/CPRA are included in our [California Privacy Notice] (Annex 1).

You may opt out of receiving marketing communications by clicking the "unsubscribe" link in our emails or by contacting us directly. However, we may still send you non-promotional emails, such as transactional emails related to your account or our ongoing business relationship.

COOKIES AND TRACKING TECHNOLOGIES

What Are Cookies?

Cookies are small data files placed on your device to help the Website function properly and provide a personalized experience.

Types of Cookies We Use

- First-party cookies: Used for session management, navigation, and user preferences.
- Third-party cookies: Including but not limited to Google Analytics, which helps us track usage and improve our Services.

Managing Cookies

You can control or disable Cookies through your browser settings. Note, however, that disabling Cookies may affect the functionality of our Website.

For more information on managing cookies, visit <http://www.aboutcookies.org>.

Third-Party Content and Cookies

Some third-party services (e.g., Google) may collect information through Cookies that are not subject to our control. Their use of information is governed by their respective privacy policies:

- Google Privacy Policy: <https://www.google.com/policies/privacy/>

INFORMATION SECURITY

We implement reasonable and appropriate administrative, technical, and physical security measures to protect your Personal Information. However, no system is completely secure.

In the event of a data breach, we will notify affected users in accordance with applicable U.S. laws (such as state data breach notification statutes).

CHILDREN'S PRIVACY

Our Website and Services are not intended for individuals under the age of 14, and we do not knowingly collect Personal Information from children. If you believe we have collected such data, please contact us immediately.

CONTACT INFORMATION

If you have any questions about this Privacy Policy or wish to exercise your privacy rights, contact us:

XONO FINANCE INC.

Email: support@xono.finance

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy at any time. We encourage you to review it frequently. Changes will take effect immediately upon posting the updated version on our Website, unless otherwise specified.

ANNEX 1

CALIFORNIA PRIVACY NOTICE

Effective Date: [Month, Day, Year]

Last Updated: [Month, Day, Year]

This California Privacy Notice applies to residents of the State of California, as required by the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA). It supplements the information contained in our general Privacy Policy.

If you are a California resident, you have additional rights regarding your personal information. This Notice explains your rights and provides information on how you can exercise them.

Category	Examples	Collected
A. Identifiers	Full name, email address, phone number, IP address	Yes
B. Personal Records	Address, account information, onboarding/KYC data	Yes
C. Commercial Information	Records of products/services purchased or considered	Yes
D. Internet Activity	Browsing history, search history, interactions	Yes
E. Geolocation Data	General location based on IP address	Yes
F. Inferences	Preferences based on usage data	Yes
G. Sensitive Personal Info	Government ID (e.g., passport, driver's license), AML/KYC docs	Yes

1. Categories of Personal Information We Collect

Over the past 12 months, we have collected the following categories of Personal Information from California residents:

We do NOT collect or process:

- Biometric information

- Sensory data (audio, visual, etc.)
- Employment or education information (unless provided voluntarily in onboarding)
- Information about minors under 13 (COPPA compliance)

2. Sources of Personal Information

We collect your personal information from:

- Information you provide directly to us
- Automated data collection through cookies and similar technologies
- Third-party service providers (e.g., KYC/AML verification providers)

3. Purposes for Collecting Personal Information

We use personal information for:

- Providing, maintaining, and improving our services
- Performing KYC/AML compliance as required by U.S. law
- Communicating with you
- Detecting and preventing fraud
- Meeting legal and regulatory obligations
- Internal analytics

4. Disclosure of Personal Information

We may disclose personal information to:

- Service providers (e.g., KYC vendors, cloud service providers)
- Government/regulatory bodies (where legally required)
- Affiliates, subsidiaries, or acquirers in the event of a merger or sale

We do NOT sell your personal information for monetary gain.

Sharing for Cross-Context Behavioral Advertising

We do NOT share your data for cross-context behavioral advertising.

5. Your California Privacy Rights

As a California resident, you have the right to:

- Know what personal information we collect, use, disclose, and sell
- Delete personal information we have collected (subject to legal exceptions, such as AML obligations)
- Correct inaccurate personal information
- Opt-out of the sale or sharing of personal information (we do not sell/share data)
- Limit the use and disclosure of Sensitive Personal Information (used only for necessary business functions)
- Non-discrimination for exercising your privacy rights

6. How to Exercise Your Rights

You may exercise these rights by submitting a verifiable consumer request via:

Email: support@xono.finance

Phone: [Insert Toll-Free Number if applicable]

Web Form (Optional): [Insert Link to Privacy Request Form]

To verify your request, we may ask you for additional information (e.g., your email, account info). We will respond to requests within 45 days, as required by law.

7. Data Retention

We retain personal information for five (5) years after the termination of our business relationship, in line with AML regulations.

8. Use of Sensitive Personal Information

We only use sensitive personal information (e.g., government IDs, AML data) for:

- Regulatory compliance

- Identity verification
- Security

We do not use it to infer characteristics about you.

9. Authorized Agents

You may designate an authorized agent to submit requests on your behalf. The agent must provide written proof of authorization, and we may still require you to verify your identity directly.

10. Minors

We do not knowingly collect personal information from children under 14. We also do not use the personal information of California consumers under 16 years of age.

Contact Information

For questions about this California Privacy Notice or your rights under the CCPA/CPRA, you can contact us at:

XONO FINANCE INC.

Email: support@xono.finance