

# PRIVACY POLICY

This Privacy Policy explains how InPlay Innovation Inc. (doing business as “Bankroll,” and referred to here as “Bankroll,” “we,” “us,” or “our”) collects, uses, discloses, and protects information in connection with the Bankroll mobile application, browser extension (if any), website, and related software and services (collectively, the “Service”).

The Service is a self-custody digital asset wallet offered to residents of, and persons located in, the fifty United States and the District of Columbia. This Privacy Policy should be read together with our Terms of Use. By using the Service, you acknowledge that you have read this Privacy Policy.

## 1. Non-Custody; What We Do Not Collect

Bankroll is a self-custody wallet. Your seed phrase and private keys are generated on your device and remain under your exclusive control. **We do not collect, store, transmit, or have access to your seed phrase, private keys, or any other Authentication Method that controls the digital assets in your wallet.** We will never ask you for any of those materials, and any person who requests them — including anyone purporting to be Bankroll support — is attempting to defraud you.

## 2. Information We Collect

### 2.1 Information You Provide Directly

- **Account information:** username or handle, email address, and any profile information you choose to provide.
- **Communications:** the content of messages you send to our support team, survey responses, and feedback.

### 2.2 Identity Verification Information

Access to the Service requires identity verification. Verification is performed by a third-party identity verification provider (the “Identity Verification Provider”). In connection with that process, the Identity Verification Provider collects information such as your legal name, date of birth, government-issued identification number (including Social Security number where applicable), images of government-issued identification documents, a selfie or biometric identifier used to match you to your identification document, and contact information. That information is provided by you directly to the Identity Verification Provider and is subject to the Identity

Verification Provider’s own privacy policy. Bankroll does not retain the full set of verification information collected by the Identity Verification Provider; we retain only the verification result, a limited set of identifiers (such as your legal name, date of birth, and address), and any records we are required to keep to satisfy applicable anti-money-laundering, counter-terrorist-financing, sanctions-screening, and recordkeeping obligations.

## **2.3 Stablecoin and ACH Information**

If you use the U.S. dollar on-ramp or off-ramp functionality described in our Terms of Use, you will provide information required to connect and verify a U.S. bank account. This information is collected and processed by the third-party Stablecoin Issuer and its banking partners in order to provide ACH-based mint and redemption services, and is subject to the Stablecoin Issuer’s own privacy policy. We receive limited information about your on-ramp and off-ramp activity (such as amount, timing, and status) to display it in your account and to satisfy our recordkeeping obligations.

## **2.4 Blockchain and On-Chain Information**

Our Service enables you to generate and use blockchain wallet addresses and to send and receive digital assets on supported blockchain networks. Blockchain wallet addresses and transactions recorded on public blockchains are publicly available by design, and we may process this public blockchain information to provide, improve, and secure the Service.

## **2.5 Information About Third-Party Connections**

When you use the Service to connect your wallet to a third-party application, game, merchant, or other partner (“Third-Party Service”) or to sign a transaction requested by a Third-Party Service, we may process information about that interaction (such as the domain or address of the Third-Party Service and the contents of the transaction or message you are being asked to sign) in order to display it to you and process the request.

## **2.6 Device and Usage Information**

When you use the Service, we may automatically collect:

- device and connection information such as device type, operating system and version, browser type, language, time zone, device identifiers that are not used for advertising, crash logs, and performance data;
- IP address, which we process to provide the Service (including to route network traffic, derive a general location for sanctions and jurisdictional compliance, and defend against abuse), and which we do not combine with your wallet address, legal name, or other identifying information except to the extent required to comply with law or enforce our Terms of Use; and
- usage information such as features accessed, in-app events, and timestamps, collected through analytics tooling as described below.

**Our systems are not designed to link your IP address with information that readily identifies you, such as your wallet address, username, or email address.**

## **2.7 Cookies and Similar Technologies**

Our website may use cookies and similar technologies for session management, security, functionality, and analytics. We use both session cookies (which expire when you close your browser) and persistent cookies (which remain until expired or deleted). You can control cookies through your browser settings. Disabling cookies may limit some functionality. Our mobile application uses on-device storage and analytics software development kits for similar purposes.

Our systems do not currently respond to browser “Do Not Track” signals. Where required by applicable state law, we honor Global Privacy Control signals as opt-out-preference signals for sale, sharing, and targeted advertising (we do not engage in those activities in any event — see Section 5).

## **3. How We Use Information**

We use the information described above to:

- provide, operate, maintain, secure, and improve the Service, including generating wallet addresses, broadcasting transactions, surfacing supported digital assets, and providing support;
- verify your identity and eligibility, conduct sanctions and fraud screening, and comply with applicable anti-money-laundering, counter-terrorist-financing, sanctions, and recordkeeping obligations;
- communicate with you about your account, security, and service-related matters, and, with your opt-in consent, send you marketing communications;
- develop new features, conduct research and analytics (typically in aggregate or de-identified form), debug errors, and measure performance;
- detect, investigate, and prevent fraud, abuse, security incidents, and violations of our Terms of Use or applicable law; and
- comply with legal obligations, respond to lawful requests from law enforcement or regulators, establish or defend legal claims, and protect the rights, property, or safety of Bankroll, you, or others.

## **4. How We Share Information**

We do not sell your personal information, we do not share your personal information for cross-context behavioral advertising, and we do not engage in targeted advertising. We may share information in the following limited circumstances.

**Service providers.** We share information with vendors that process information on our behalf to operate the Service, including cloud hosting and infrastructure providers, analytics providers, fraud-prevention and information-security providers, customer-support tools, communications providers, and professional advisors. These providers are contractually bound to use the information only to perform services for us and to safeguard it.

**Identity Verification Provider.** As described in Section 2.2, verification is performed by a third-party provider acting under its own privacy policy. We receive the result of verification and a limited set of identifying fields.

**Stablecoin Issuer.** If you use ACH on-ramp or off-ramp functionality, information necessary to initiate and settle those transactions is processed by the Stablecoin Issuer and its banking partners under their own privacy policies. We do not share any more information with the Stablecoin Issuer than is necessary to enable the activity you have requested and to comply with applicable law.

**Third-Party Services you connect to.** If you connect your wallet to a Third-Party Service or sign a transaction requested by one, information about the transaction or message (and your wallet address, which is public) is shared with that Third-Party Service at your direction. Third-Party Services are governed by their own terms and privacy policies.

**Legal and safety.** We may disclose information when we believe in good faith that disclosure is required or permitted by applicable law, subpoena, court order, or other legal process; to respond to lawful requests from law enforcement, regulators, or other government authorities; to enforce our Terms of Use; or to protect the rights, property, or safety of Bankroll, our users, or others, including to detect, prevent, or address fraud or security issues.

**Corporate transactions.** If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, information may be transferred as part of that transaction, subject to the terms of this Privacy Policy.

**With your consent or at your direction.** We may share information in other circumstances with your consent or at your direction.

**Aggregated or de-identified data.** We may share aggregated or de-identified information that cannot reasonably be used to identify you for any lawful purpose.

## **5. No Sale, No Sharing, No Targeted Advertising**

Bankroll does not “sell” personal information in exchange for monetary or other valuable consideration, does not “share” personal information for cross-context behavioral advertising, and does not use or disclose personal information for targeted advertising or profiling in furtherance of decisions that produce legal or similarly significant effects. We do not use advertising identifiers (such as IDFA or Android Advertising ID) for advertising purposes. We do not knowingly process the personal information of consumers under 16 for any of the foregoing purposes.

## **6. Marketing Communications**

Marketing emails and marketing push notifications are sent only to users who have affirmatively opted in. You may opt out at any time by following the unsubscribe instructions in any marketing email, by adjusting your in-app notification settings or your device notification settings, or by emailing us at

privacy@inplayinnovation.com. We may continue to send you transactional and service-related communications (such as security alerts, verification prompts, and changes to these policies) after you opt out of marketing.

## 7. Your Rights and Choices

Subject to applicable law and certain exceptions, you may have the right to:

- **access** or request a copy of the personal information we hold about you;
- **correct** personal information that is inaccurate or incomplete;
- **delete** personal information we hold about you;
- **port** personal information you provided to us in a structured, commonly used format;
- **opt out** of sale, sharing, targeted advertising, or certain profiling (we do not engage in any of these, so there is nothing to opt out of, but you may formally submit a request); and
- **not be retaliated against** for exercising these rights.

To submit a request, email [privacy@inplayinnovation.com](mailto:privacy@inplayinnovation.com). We will verify your identity before fulfilling a request, which may require you to confirm information associated with your account. You may designate an authorized agent to submit a request on your behalf; the agent must provide signed, written permission or a valid power of attorney, and we may separately verify your identity. We will respond within the time required by applicable law. We may decline a request, in whole or in part, where permitted by law, such as where the information is needed to detect fraud, protect security, comply with a legal obligation, or exercise or defend legal claims. If we decline a request, you may appeal our decision by responding to our decision email.

Exercising your deletion right may mean that you are no longer able to use the Service. Certain information is subject to legal retention requirements (for example, Bank Secrecy Act recordkeeping) and cannot be deleted on request.

## 8. Security

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, disclosure, alteration, or destruction, including access controls, encryption of data in transit and at rest, monitoring, and least-privilege access practices. No system is perfectly secure, and we cannot guarantee the security of information transmitted to or from the Service. You are responsible for safeguarding your Authentication Method; please see Section 1.

## 9. Data Retention

We retain personal information for as long as is necessary to provide the Service, comply with our legal and regulatory obligations (including Bank Secrecy Act recordkeeping, which generally requires five years), resolve disputes, enforce our

Terms of Use, and pursue our legitimate business interests. When we no longer need personal information, we delete it or de-identify it in a manner consistent with applicable law.

## 10. Children's Privacy

The Service is offered only to individuals who are at least 18 years of age. The Service is not directed to, and we do not knowingly collect personal information from, anyone under 18. If you believe a person under 18 has provided personal information to us, please contact [privacy@inplayinnovation.com](mailto:privacy@inplayinnovation.com) and we will take appropriate steps to delete the information.

## 11. Third-Party Links and Services

The Service may contain links to, or integrations with, third-party websites, applications, and services, including Third-Party Services as defined in our Terms of Use. We are not responsible for the privacy practices of those third parties. We encourage you to review their privacy policies before providing them with personal information or connecting your wallet to them.

## 12. U.S. State Privacy Rights

This section supplements the rest of this Privacy Policy and applies to residents of U.S. states that have adopted comprehensive consumer privacy laws, including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia. Rights available to you vary by state.

**Categories of personal information we collect.** In the past twelve (12) months, we have collected the following categories of personal information: identifiers (such as name, email address, account identifiers, IP address, device identifiers not used for advertising, and public wallet addresses); government-issued identification information collected through the Identity Verification Provider for the limited purposes described in Section 2.2; commercial information (such as on-chain transaction records and records of on-ramp and off-ramp activity); internet or other network activity information (such as interactions with the Service); geolocation data derived at a general level from IP address; audio or visual information collected through customer support or identity verification (for example, images of government-issued identification and selfies used to match them); professional or employment information only to the extent voluntarily provided; sensitive personal information limited to government identifiers and biometric identifiers processed solely for identity verification and compliance purposes and not used to infer characteristics about you; and inferences drawn from the foregoing solely for providing and improving the Service.

**Sources, purposes, and recipients** of each category are described in Sections 2, 3, and 4 above.

**Sale, sharing, and targeted advertising.** We do not “sell” or “share” personal information as those terms are defined under state privacy laws, and we do not process personal information for targeted advertising, profiling in furtherance of decisions that produce legal or similarly significant effects, or any other activity requiring an opt-out under state law. We do not knowingly engage in any of these activities with respect to consumers under 16 (or, in some states, under 13).

**Your rights.** Depending on your state of residence, you may have the right to (a) know or access the personal information we have collected about you; (b) receive a copy of your personal information in a portable format; (c) correct inaccurate personal information; (d) delete personal information; (e) opt out of sale, sharing, targeted advertising, or certain profiling; (f) limit our use or disclosure of sensitive personal information (note that our limited use of sensitive personal information for identity verification and compliance is permitted without opt-out under most state laws); and (g) appeal a denial of a rights request. You may exercise these rights by emailing [privacy@inplayinnovation.com](mailto:privacy@inplayinnovation.com). You may designate an authorized agent as described in Section 7. We will not discriminate against you for exercising any of these rights.

**California “Shine the Light.”** California Civil Code § 1798.83 entitles California residents to request information about our disclosure of certain categories of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for their own direct marketing purposes.

## **13. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. If we make material changes, we will notify you through the Service or by email to the address associated with your account, and we will update the “last updated” date. Your continued use of the Service after the updated Privacy Policy becomes effective indicates your acceptance of the updated Policy.

## **14. Contact Us**

Questions, comments, or complaints regarding this Privacy Policy, or requests to exercise privacy rights, may be directed to:

InPlay Innovation Inc.  
Attn: Privacy  
1212 Fifth St Ste 1 - 526 Santa Monica, CA 90401  
Email: [privacy@inplayinnovation.com](mailto:privacy@inplayinnovation.com)