

HYPERBLOOM PRIVACY POLICY OF THE

version of 24 July 2025

1. Introduction

This HyperBloom Privacy Policy(the “**Privacy Policy**”) describes how Aiom Inc., a company established under the Panamanian law with its registered office in Panama City, Panama (“**AIOM**”, “**we**”, “**our**”, “**us**”) collects and uses your personal data in connection with your use of the Website and the Services.

The rules for using the Website and Services are set out in the HyperBloom Terms of Service(the “**Terms**”). Please read the Terms before accessing the Website or the Services. BY USING THE WEBSITE OR THE SERVICES, YOU AGREE TO THE PROCESSING OF YOUR PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE, PLEASE REFRAIN FROM USING THE WEBSITE OR THE SERVICES.

2. Changes

The current version of the Privacy Policy has been adopted and is effective as of 24 July 2025.

We may change the Privacy Policy from time to time. For example, we may do this when it is necessary due to changes in the Terms, changes in legal requirements or changes in the way we use your personal data. We may also amend the Privacy Policy to make it clearer, more accessible, and/or easier for you to understand.

You should check the Privacy Policy before using the Website and/or the Services. If we change the Privacy Policy, we will give you access to previous versions of the Privacy Policy.

3. Definitions

We use defined terms in the Privacy Policy. We capitalise them. You can familiarise yourself with them below:

- **AIOM** (“**we**”, “**our**”, “**us**” etc.) – AIOM Inc., a corporation incorporated in the Republic of Panama, with its registered seat at: Oceania Business Plaza, 21st floor, Tower 1000, Isaac Hanono Missri Street, Punta Pacifica, the City of Panama, Republic of Panama, entered into the Public Registry Office of Panama, Mercantile Section at Folio 155767352.
- **Applicable Data Protection Law** – any applicable laws, statutes, regulations, orders, regulatory requirements, bylaws, and other similar legal instruments in force from time to time relating to data protection, data security, privacy and/or the collection, use, disclosure and/or processing of personal data, including but not limited to the GDPR.
- **Blockchain Services** – the Blockchain Services as defined in the Terms.
- **Connected Wallet** – the Connected Wallet as defined in the Terms.
- **controller, processor, processing**, and other terms relating to personal data not defined here have the meaning as defined in Art. 4 of the GDPR.
- **DEX Platform** – the DEX Platform as defined in the Terms.
- **EEA** – European Economic Area.
- **FAQ** – the description of the HyperBloom Points game available at: <https://app.hyperbloom.xyz/points>.
- **Game** – the HyperBloom Points game set out in the FAQ.
- **GDPR** – General Data Protection Regulation 2016/679 of 27 April 2016.
- **ICT Systems** – the ICT Systems as defined in the Terms.

- **Instruction** – the Instruction as defined in the Terms.
- **personal data** – information about identified or identifiable natural person as defined in Art. 4(1) of the GDPR.
- **Points** – the points as set out in the FAQ.
- **Privacy Policy** – this HyperBloom Privacy Policy.
- **Services** – the Services as defined in the Terms.
- **Terms** – the HyperBloom Terms of Service available at: <https://app.hyperbloom.xyz/terms-of-service.pdf>.
- **Third Party** – the Third Party as defined in the Terms.
- **Transaction** – the Transaction as defined in the Terms.
- **User** (“you”, “your”, etc.) – the User as defined in the Terms.
- **Website** – the Website as defined in the Terms.

4. Controller

AIOM is the controller of your personal data (you can find detailed information about us in Section 4).

5. Contact details of the controller

You can contact us with any inquiries or complaints in respect of the personal data:

- by email at: aionlabsp@gmail.com
- in writing to our address: Oceania Business Plaza, 21st floor, Tower 1000, Isaac Hanono Missri Street, Punta Pacifica, Panama City, Republic of Panama.

6. Data sources

We only collect your personal data if this is legally permitted and only to the extent necessary to achieve our purposes. We use the following sources of personal data:

- **Blockchain networks** – we collect personal and/or anonymous data from blockchain networks in connection with providing the Services which it involves use of blockchain networks. Such information may include personal and/or anonymous data (please consult Section 7 for more details).
- **Third parties** – we collect your personal data from Third Parties in connection with your use of the Website or the Services. For example, Vercel Analytics, Hotjar, Google Analytics.
- **You and your devices** – we collect data from you directly, for example when you contact us, and also from your devices, for example when you use the Website via a web browser.

7. Data categories

We only use your personal data if this is legally permissible and only to the extent necessary to achieve our purposes as defined in Section 8. We collect and use the following categories of your personal data:

- **Blockchain data:** The blockchain data includes anonymous data and, in some cases, your personal data that we receive in connection with your use of the Blockchain Services, as well as our activity and the activity of third parties connected with rendering the Blockchain Services. This includes publicly accessible on-chain information (which can be personal data) and limited off-chain information of technical nature (anonymous data, as a rule). This also includes Connected Wallet public address which is a personal data when the Connected Wallet can be linked to you (the User). In

general, if blockchain data allows for your identification we treat it as personal data in compliance with the Applicable Data Protection Law. For example, this includes:

- Public address of the Connected Wallet
 - Transaction IDs
 - Timestamps of Instructions or events
 - Instructions, including Transaction amounts, selected crypto-assets and DEX Platforms
- **Customer support data:** The customer support data includes data collected and used in connection with customer support provided by us to you. For example, this may include:
 - Call recordings
 - Information relating to compliments or complaints
 - Names and contact details
 - Records of meetings and decisions
 - Website user information (including user journeys)
- **Marketing data:** data collected and used in connection with our marketing activities, including marketing segmentation and conducting direct marketing in specific communication channels based on your marketing consents. For example, this includes:
 - Your email address
- **Game data:** the Game data includes data related to your participation in the Game. This includes:
 - Your position in the Game ranking as displayed in the dashboard on the Website (your rank)
 - Your tier in the Game
 - The number of collected Points
 - The date of joining the Game
 - Public address of the Connected Wallet
- **Technical data:** The technical data includes data collected and used in connection with the ICT Systems to provide the Services. Most of this information is anonymous data. However, in some cases it may be used to identify you, for example in combination with other data. In such cases we treat it as personal data. For example, this includes:
 - IP addresses
 - Location data
 - User hardware and software data
 - Website user information (including user journeys)

We do not knowingly collect your personal data as defined in Articles 9 and 10 of the GDPR (so-called sensitive data). Such data includes: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning that person's health, sexuality or sexual orientation, data concerning criminal convictions and offences or related security measures. If we receive such personal data by accident, we will delete it immediately and, where appropriate, ask you to give your express consent to its processing for a specific purpose before using it (if permitted by law).

8. Purposes and legal grounds of processing of personal data

We only process your personal data when it is lawful to do so. Each purpose for which we use your personal data has a specific basis for processing personal data in accordance with the table below.

Purpose of processing	Legal ground of processing
Provision of Services on the basis of an Agreement	Necessity of processing for the performance of a contract – Art. 6(1)(b) GDPR
Participation in the Game	Our legitimate interest (enabling your participation in the Game) – Art. 6(1)(f) GDPR
Handling consumer complaints	Legal obligation – Article 6(1)(c) of the GDPR
Handling your questions, requests, applications and communications other than consumer complaint	Our legitimate interest (protection of your and our rights) – Art. 6 (1) (f) GDPR
Ensuring the confidentiality and security of the Website and Services (including log audits, bug fixing, protection against abuse, fraud or violations of morality)	Legal obligation – Art. 6(1)(c) GDPR (to the extent required by that law) Our legitimate interest (protection of your rights and our rights) – Art. 6(1)(f) GDPR (to the extent other than required by the aforementioned law)
Marketing our products and services (including marketing segmentation and direct marketing via electronic communication channels such as email)	Our legitimate interest (data processing for marketing purposes) – Art. 6 (1) (f) GDPR
Establishment and assertion of legal claims or defence against legal claims	Our legitimate interest (pursuit and defence of our legal interests or legal claims) – Art. 6 (1) (f) GDPR
Statistical analysis of your behaviour and preferences to improve the quality of the Website and Services (including your interactions with the Website interface)	Our legitimate interest (improvement of the quality of the application and services) – Art. 6(1)(f) GDPR

9. Data retention

We only store your personal data for as long as is necessary for the purposes for which we collected it. Each purpose for which we use your personal data has a specific maximum period of storage. We store your data depending on the purpose of processing:

- **Provision of Services on the basis of an Agreement** – for the duration of the Agreement;
- **Participation in the Game** – for the duration of your participation in the Game or until you object to the processing of your personal data (in such case you cannot participate in the Game);
- **Handling consumer complaints** – for 3 years from the end of the calendar year in which we received your message;
- **Handling your questions, requests, applications and communications other than consumer complaints** – for 3 years from the end of the calendar year in which we received your message;
- **Ensuring the confidentiality and security of the Website and Services** – for the duration of the Agreement and for a period of 3 years following the end of the calendar year in which the Agreement was terminated;
- **Marketing our products and services** – until you object to the processing of your personal data or withdraw your marketing consent for a given communication channel (if applicable);
- **Establishment and assertion of legal claims or defense against legal claims** – for the duration of the Agreement and/or your participation in the Game and for a period of 3

years following the end of the calendar year in which the Agreement was terminated and/or you stopped participating in the Game;

- **Statistical analysis of your behaviour and preferences to improve the quality of the Website and Services** – for the duration of the Agreement and for a period of 3 years following the end of the calendar year in which the Agreement was terminated.

After the end of the data retention period, we permanently delete or anonymise personal data. In certain situations, the period of data retention or use may be extended. For example, we may use your personal data after the termination of the Agreement when required by law or in connection with judicial or administrative proceedings (e.g. your personal data constitutes evidence in a case). In this case, we will store your personal data for the period required by law or until the proceedings have been legally concluded.

10. Data recipients

As a rule, we do not share your personal data unless it is necessary. For example, we may share your personal data in connection with the provision of the Services under the Terms. We may disclose your personal data to the following categories of recipients:

- our business partners (including service providers and contractors), such as analytical tools providers or data storage providers;
- AIOM group entities, including our affiliates, subsidiaries and, in the event of a merger, acquisition or reorganisation, the involved third party;
- public authorities or other third parties when required by law and subject to statutory conditions and restrictions;
- professional advisors, such as lawyers, accountants, consultants, and tax advisors.

11. Data transfers

The level of protection for the personal data outside the European Economic Area (EEA) differs from that provided by the EU law. For this reason, we transfer your personal data outside the EEA only when necessary and with an adequate level of protection. We secure the adequate level of protection primarily by cooperating with processors of the personal data in countries for which there has been a relevant European Commission decision finding an adequate level of protection for the personal data. Alternatively, we may use the standard contractual clauses issued by the European Commission. If you want to learn more about these safeguards, obtain a copy of them or learn where they have been made available, contact us (see Section 5).

12. Requirement to provide personal data

In certain cases, provision of your personal data is mandatory by law or necessary to manage your request or to perform a contract we have with you. If you don't provide us with your personal data in such situations, we may not be able to carry out your request, perform a contract with you (or enter into it) or comply with the law. In some cases, this may mean that we will terminate the contract or stop our engagement with you. For example, if you do not provide your personal data necessary for the complaint procedure, we may not be able to manage your complaint.

In other cases, provision of your personal data is voluntary. If you don't provide us with your personal data in such situations, we may not be able to carry out your request or achieve our goal. For example, if you do not agree to the use of your data for the development of our AI tools, we will not be able to use it for this purpose.

13. Automated decision-making

We are not using automated decision-making.

14. Cookie notice

14.1. What are cookies?

Cookies are small text files installed on your device that collect information which, generally, facilitates use of the Website and the Services. For example, cookies may remember your language preferences or other settings of your Internet browser. In most cases information used in connection with cookies is personal data.

We mainly use our own cookies. We also use third-party cookies, i.e. cookies from a domain other than the domain of the visited website, primarily for analytical activities. We may also use other technologies similar to cookies, for example HTML5 local storage, *Local Shared Objects* or tracking pixels. Where we refer to cookies in this Cookie Notice, we also mean such technologies.

14.2. What cookies are used?

The cookies are used only when it is admissible by law. The following types of cookies are used in connection with your use of the Website and the Services.

14.2.1. Necessary cookies

The necessary cookies are a type of cookies that are required by the Website and the Services to function properly. For example, these types of cookies are installed to recall your login sessions and privacy settings. They are set by us. They are mandatory because they are necessary for the provision of the Website and the Services.

14.2.2. Functional cookies

The functional cookies are a type of cookies that are used to improve the functionality of the Website. For example, such cookies may be installed to remember your language preferences. They may be set by us or by third-party providers engaged by us. They are optional, so we use them only with your consent.

14.2.3. Analytical cookies

The analytical cookies are a type of cookies that enable collecting information such as number of visits and traffic on the Website for statistical purposes. For example, these types of cookies may be installed to analyse how you navigate the Website to improve the performance of the Website. They may be set by us or by third-party providers engaged by us. They are optional, so we use them only with your consent.

14.3. Description of the cookies

Each cookie has a specific provider responsible for the cookie (e.g. us or a third party), a specific purpose of use, and a maximum functioning period. If the provider of a cookies is a third party, such third party has access to such cookies. The duration of the operation of cookies depends on their type and purpose. In general, there are two types of cookies: session cookies and persistent cookies. Session cookies expire at the end of a given session. Persistent cookies are stored on the device for a longer period. They do not expire after the end of a given session. The maximum period after which our cookies expire is 12 months.

The following cookies are used in connection with your use of the Website or the Services:

NECESSARY COOKIES

Cookie name	Purpose	Provider	Duration

FUNCTIONAL COOKIES

Cookie name	Purpose	Provider	Duration

ANALYTICAL COOKIES

Cookie name	Purpose	Provider	Duration
Vercel Analytics	Platform analytics	Vercel	Lifetime
Google Analytics	Platform analytics	Google	Lifetime
Cloudflare Web Analytics	Platform analytics	Cloudflare	Lifetime
Cookie3 Analytics	Platform analytics	Cookie3	Lifetime

14.4. Access of third parties to the cookies

We do not allow third parties to access cookies for which we are responsible unless it is necessary. For example, we may allow such access when it is necessary to perform third-party analytics services. In addition, some of our service providers' solutions involve storing or accessing information on your end device, including the use of cookies.

Below we describe in greater detail some tools of our partners used for analytical or marketing purposes:

14.4.1. Cloudflare Web Analytics

Cloudflare Web Analytics is a tool to analyse the use of the Website and to produce statistics and reports on its operation. The solution provider is Cloudflare, Inc., address: 101 Townsend St., San Francisco, California 94107, USA. More information about Cloudflare Web Analytics can be found at: <https://www.cloudflare.com/en-gb/web-analytics>. You can find more information about the processing of your personal data by Cloudflare, Inc. at: <https://www.cloudflare.com/en-gb/privacypolicy>.

14.4.2. Google Analytics

Google Analytics is a tool to analyse the use of the Website and to produce statistics and reports on its operation. The solution provider is Google Ireland Limited, address: Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland. More information about Google Analytics can be found at: <https://analytics.google.com/analytics/web/provision>. You can find more information about the processing of your personal data by Google Ireland Limited at: <https://policies.google.com/privacy>.

14.4.3. Hotjar

Hotjar includes a group of tools to analyse use of the Website and to produce statistics and reports on its operation. The tools include in particular:

- Heatmaps – which show where users move, click, and scroll (<https://www.hotjar.com/product/heatmaps>);
- Surveys – AI-powered surveys to validate ideas and improve user experience

across the Website (<https://www.hotjar.com/product/surveys>);

- Feedback – real-time user feedback (<https://www.hotjar.com/product/feedback>);
- Hotjar Tracking Code – analytical tool

(<https://help.hotjar.com/hc/en-us/articles/6952777582999>).

The solution provider is Hotjar Limited, address: Dragonara Business Centre 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141 Malta. You can find more information about the processing of your personal data by Hotjar Limited at:

<https://help.hotjar.com/hc/en-us/sections/360007966773-Data-Privacy>.

14.4.4. Vercel Analytics

Vercel Analytics is a tool that allows to track page views and custom events on website deployed to Vercel. Vercel allows tracking website traffic and collecting insights using a hash created from the incoming request to identify end users. The lifespan of a visitor session is automatically discarded after 24 hours. The solution provider is Vercel Inc., address: 440 N Barranca Ave #4133, Covina, CA 91723, California United States. You can find more information about the processing of your personal data by Vercel Inc. at:

<https://vercel.com/docs/analytics/privacy-policy>.

14.5. Your cookie choices

There are several ways in which you can manage cookies.

14.5.1. Your consent

Optional cookies, for example advertising cookies, are used only with your consent. You can withdraw your consent at any time. You can do this through your cookie settings (Section 14.5.2) or through your browser settings (Section 14.5.3).

14.5.2. Cookie settings

You can manage your cookie settings using our cookie management panel ([click here](#)). You can access the cookie management panel from the Website. To do so, click the "Cookie Settings" link located in the footer at the bottom of the Website. You can also access the cookie management panel by clicking the corresponding button on the cookie banner that appears at the bottom of the screen during your first visit to the Website.

14.5.3. Web browser

You can also manage cookies through your web browser. For example, you can delete all or some cookies from your device or block them. Please note that deleting or blocking cookies may cause the Website or the Services to not function properly or to stop functioning altogether.

To manage cookies through your web browser, refer to the instructions provided by your browser provider. For example, some of such instructions for the relevant web browsers can be found on the websites of their operators: Microsoft (Internet Explorer, Edge), Google (Chrome), Apple (Safari), Mozilla (Firefox), Opera (Opera).

14.5.4. Your rights related to personal data

You have rights related to your personal data in cases the cookie files contain your personal data.

15. Your rights

To exercise your rights, please contact us (Section 5).

- **Your right of access** – You have the right to ask us for copies of your personal data.
- **Your right to rectification** – You have the right to ask us to rectify personal data you think it is inaccurate. You also have the right to ask us to complete data you think it is incomplete.
- **Your right to erasure (right to be forgotten)** – You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to data portability** – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. This right applies where we use your data based on your consent or a contract and if the processing of your data is carried out by automated means.
- **Your right to object to processing** – You have the right to object to the processing of your personal data in certain circumstances. You can do this at any time. If you raise an objection, we will stop using your personal data where the basis for processing is our legitimate interest. In exceptional circumstances, we may continue to use your data despite your objection. This exception does not apply when you object to the processing of data for direct marketing purposes, i.e., if you object to it, we will stop processing your personal data on this basis.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent. You can do this at any time. If you withdraw consent, we will stop using your personal data where the basis for processing is consent. Withdrawal of consent does not affect the lawfulness of processing your data based on consent before withdrawal.
- **Your right to lodge a complaint with a supervisory authority** – You have the right to lodge a complaint with a supervisory authority dealing with personal data protection. You can lodge such a complaint with your local data protection authority or with the Panama's National Authority of Transparency and Access to Information (*La Autoridad Nacional de Transparencia y Acceso a la Información*), the Panamanian supervisory authority based in Ancón, Panama (<https://www.antai.gob.pa>).

You do not usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you as a rule. To make a data protection rights request, contact us using our contact details (Section 5).

16. Children

The Website and the Services are restricted to persons who are at least 18 years of age. We do not knowingly collect personal data from people who are less than 18 years of age in connection with the Website and the Services.