

## AIR PRIVACY POLICY

LAST MODIFIED: 26 MAY 2025

We respect your privacy and commit to protecting it through our compliance with the practices described in this notice. This notice describes our practices for collecting, using, maintaining, protecting, and disclosing the personal data we may collect from you or that you may provide when you create an AIR Account(s) through [www.mocaverse.xyz](https://www.mocaverse.xyz), our mobile application or through a Third Party Account or other communications or forms that link or refer to this notice (“**Our Services**”). Crowd Education Limited (“**we**”, “**us**” “**our**”) and you is a “**Party**” and collectively the “**Parties.**”

This notice applies to personal data collected through the use of Our Services, regardless of the country where you are located. Our Services may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. We do not control these third-party websites, and we encourage you to read the privacy notice of every website you visit.

Please read this notice carefully to understand our policies and practices for processing and storing your personal data. By engaging with Our Services, you accept and consent to the practices described in this notice. This notice may change from time to time. Your continued engagement with Our Services after any such revisions indicates that you accept and consent to them, so please check this notice periodically for updates.

This Privacy Policy shall be read with the Terms of Use for AIR Services (“**Terms**”). All capitalized terms used in this Privacy Notice are defined in the Terms.

Please refer to <https://www.mocaverse.xyz/privacy-policy> which describes our practices for collecting, using, maintaining, protecting, and disclosing the personal data we may collect from you or that you may provide when you access or use <https://www.mocaverse.xyz>.

### Data We May Collect About You

We collect and use different types of data from and about you including:

- a. Personal data that we could reasonably use to directly or indirectly identify you, such as your email address, username, wallet address, or other similar social identifier, or any other identifier we may use to contact you online (“**personal data**”).
- b. Details of your activities in your AIR Account, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information (e.g., login time), browser type and version, time-zone setting, operating system and platform, type of device you use, unique device identifier.
- c. Non personal details about your interactions, including the full Uniform Resource Locators (URLs), clickstream information to, through, and from Our Services (including date and time), products viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page.
- d. Non-personal data that does not directly or indirectly reveal your identity or directly relate to an identified individual, such as demographic information, statistics, or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal data. For example, we may aggregate personal data to calculate the percentage of users accessing a specific Website feature.

If we combine or connect non-personal, demographic, or technical data with personal data so that it directly or indirectly identifies an individual, we treat the combined information as personal data.

## How We Collect Data About You

We use different methods to collect data from and about you including through:

- a. Direct interactions. You may give us information about you by filling in forms or by corresponding with us by email, chat or otherwise. This includes information you provide when you create an AIR account and log into such account, participate in discussion boards or other social media functions on Our Services , enter a competition, promotion or survey, and when you report a problem with Our Services .
- b. Automated technologies or interactions. As you interact with Our Services , we may automatically collect technical data about your equipment, device, geographical region, browsing actions and patterns as specified above. We collect this information by using cookies, server logs, and other similar technologies.
- c. Third parties or publicly available sources. We may receive information about you if you visit other websites or applications employing our cookies or from third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, data brokers, or aggregators.

## Cookies And Automatic Data Collection Technologies (“Cookie Policy”)

Our Services use cookies (small files placed on your device) or other automatic data collection technologies to distinguish you from other Website users. These technologies are employed by most online service providers to enable efficient navigation, secure data, understand usage, store preferences, and enhance overall user experience. This helps us deliver a better and more personalized service when you access Our Services and enables us to improve your user experience.

Cookies originating from the site owner are termed "first-party cookies," while those set by other entities are "third-party cookies." For more details on third-party cookies, visit the respective third party's website.

Our usage of cookies serves several purposes:

**Necessary Cookies** These cookies are crucial for the operation of our Services and enable core functionality such as security, network management, and accessibility. They respond to your service requests like setting privacy settings, logging in, or completing forms, and include security cookies to thwart unauthorized access.

**Analytical Cookies:** We use analytics tools to collect information about your interaction with Our Services to enhance your experience and the services we offer. This data is gathered through analytics JavaScript running on your device in a way that does not directly identify individuals.

You may refuse to accept browser cookies (except for necessary cookies) by activating the appropriate setting on your browser. However, if you select this setting, your user experience may be affected, and certain features may not work correctly. Unless you adjust your browser settings to refuse cookies, our system will issue them.

We may revise this Cookie Policy periodically to reflect changes in our practices or for operational, legal, or regulatory reasons. Visit this policy regularly to stay informed about our cookie usage.

## How We Use Your Personal Data

We use your personal data to provide you with access to the Website, improve your user experience on the Website, communicate with you or to conduct other business operations, such as using data to improve and personalize your experiences. Examples of how we may use the personal data we collect include to

- a. Present Our Services and provide you with the information, products, services, and support that you request from us.

- b. Fulfill the purposes for which you provided the data or that were described when it was collected.
- c. Notify you about changes to Our Services, products, or services.
- d. Administer Our Services and conduct internal operations, including for troubleshooting, data analysis, testing, research, statistical, and survey purposes.
- e. Improve Our Services, products or services, marketing, or customer relationships and experiences.
- f. Protect Our Services and the offering of Our Services.
- g. Meet our obligations and enforce our rights arising from any contracts with you, including for billing or collections, or comply with legal requirements.
- h. If you have opted to receive offers and promotions from us, we may use your personal data to send you latest news, updates, contests, promotions, offers, products, services and rewards offered by us or any of our Partners (**'direct marketing communications'**). Before providing you with direct marketing communications, we will always ask for your consent. You may choose at any time not to receive any direct marketing communications from us.

We may also use non-personal data for any business purpose.

#### Lawful Basis for Processing Personal Data

We will use your personal data for one or more of the following purposes and for the following lawful bases:

| Purpose   | Categories of personal information   | Lawful Basis  |
|---|--|---|
| Setting up and use of your AIR Account (s) and/or Third Party Account   | Email address and/or, login credentials,   | Necessary for the performance of a contract to which the data user is a party |
| Communicating with You to providing support services  | Dependent on the support required, but may be any of the personal information stored such as name, email address, social media handles and/or wallet address; geographical region  | Necessary for the performance of a contract to which the data user is a party |
| Analytics debugging, identify and repair errors   | Personal information collected via cookies: Varies depending on the issue being reported but likely to be name and email address; social media handles, wallet address;  | Necessary for the performance of a contract to which the data user is a party |
| Session identification and behavior tracking understanding which parts of our services are of most interest to you; | Personal information collected via cookies: the date and time of the user's website visit, the web address from which the User accessed the website, the number of visitors to the website, the pages viewed, and the length of time on the website, browser type and operating system and IP address,               | Legitimate interest   |
| Login and security, authentication. Login and account selection preferences   | Personal information collected via cookies: domain name, the date and time of the user's website visit, the web address from which the User access of the website, the number of visitors to the website, the pages viewed, and the length of time on the website, browser type and operating system and IP address, | Legitimate interest   |

|   |  |              |
|---|--|--------------|
| Data analysis, including identification of user interest and trends, for example, understanding which parts of our services are of most interest to you; tailor content and direct marketing communications to your preferences | User name, email address, social media handles, region | User consent |
| Send you direct marketing communications  | email address, region; device information              | User consent |

### Disclosure Of Your Personal Data

We may share the following categories of your personal data with the following categories of recipients:

| Categories of personal data shared                                 | Recipient   | Activity undertaken by recipient in relation to personal data received  |
|--|---|---|
| Username, email address  | Any member of our corporate group   | Data analysis   |
| Username, geographical region                                      | Our business partners   | Hosting joint campaigns or activities, identifying usage trends   |
| Passkey containing user identifier                                 | Third Party Service provider(s)   | Performance of Third Party Services   |
| Username, email address and/or other personal data provided by you | Our service providers and subcontractors who provide services such as website hosting and infrastructure, data analysis and other I.T. services | Performance of services to users such as allowing user access to quests and activities, tracking user activity and behaviour, |
| Username, email address and wallet address                         | Government bodies, courts and tribunals   | Performance of legal and regulatory functions   |

We may also disclose your personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

- to a buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, where one of the transferred assets is the personal data we hold;
- to comply with any court order, law, or legal process, including responding to any government or regulatory request; and to protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection, and credit risk reduction.

We may share non-personal data without restriction.

### **Consent To Personal Data Transfer**

We are based in Hong Kong. We may process, store, and transfer the personal data we collect, in and to a country outside your own, with different privacy laws that may or may not be as comprehensive as your own.

In particular, we may transfer the personal data we collect to (i) any other country in which we engage our service providers with respect to any processing or storage in order to provide our services.

By submitting your personal data or engaging with Our Services, you consent to this transfer, storing, or processing of your personal data.

### **Retention period**

We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you (for example, for as long as you have an account with us);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

### **Accessing And Correcting Your Personal Data**

You may send us an email at [compliance@animocabrands.com](mailto:compliance@animocabrands.com) to request access to, correct, or delete personal data that you have provided to us or opt out or object to use of your personal data in relation to your Air Account(s) or Master Account. We may not accommodate a request to change or delete information if we believe the change or deletion would violate any law or legal requirement or negatively impact the information's accuracy.

You have the following rights with respect to your personal data:

- Right of access to personal data provided
- Right to correct incomplete, inaccurate, or to update outdated data
- Right to information on the possibility of not providing consent and on the consequences of such denial
- Right to withdraw or revoke consent
- Right not to be subject to a decision based solely on automated processing, or profiling, which produces legal effects or negatively affects the individual
- Right to have data deleted or erased

- Right to either opt out of or object to certain processing
- Right to have the data ported (transferred) to a different third-party provider
- Right not to be subject to discrimination
- Right to restriction of processing – this will only apply in certain circumstances
- Right to data portability – this will only apply in certain circumstances
- Right to object – this will only apply in certain circumstances
- Existence of the right to lodge a complaint with a local data protection authority

To exercise your rights in relation of your personal data provided by you to Third Party Providers for the use of Third Party Services, please contact the relevant Third Party.

### **Data Controlled by You**

You have control over any Verifiable or Verified Credentials issued to you and and/or Wallet Credentials in relation to you Master Account and/or your AIR Account(s).

The use of your AIR Account, Master Account and/o any Verified Credentials on third party websites is governed by your agreements and arrangements with the owners of such third-party websites. We exercise no control over any third parties with which you use your AIR Account, Master Account and/or any Verified Credentials and how such third parties may use your information and/or data.

### **Data Security**

The security of your personal data is very important to us. We use physical, electronic, and administrative safeguards designed to protect your personal data from loss, misuse, and unauthorized access, use, alteration, or disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of Our Services , you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to Our Services. Any transmission of personal data is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Website.

### **Residents of the European Economic Area (“EEA”)**

If you are a resident of the EEA, Switzerland, or the United Kingdom, you may have additional rights under the General Data Protection Regulation (the “GDPR”) and other applicable law with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. The term ‘you’ refers to ‘data subject’ as defined in the GDPR.

Mocaverse will be the controller of your Personal Data processed in connection with services accessible on Our Services and data processors are recipients i.e. the natural or legal person, public authority, agency or other body that processes the data as disclosed in the section.

### **Children's Online Privacy**

We do not direct Our Services to minors and we do not knowingly collect personal data from children under 16 years of age or as defined by local legal requirements. If we learn we have mistakenly or

unintentionally collected or received personal data from a child without appropriate consent, we will delete it. If you believe we mistakenly or unintentionally collected any information from or about a child, please contact us at [compliance@animocabrands.com](mailto:compliance@animocabrands.com).

### **Changes To Our Privacy Notice**

We will post any changes we may make to our privacy notice on this page and indicate on the Website home page that we updated this privacy notice. If the changes materially alter how we use or treat your personal data we will notify you by email to the primary email address specified in your account. Please check back frequently to see any updates or changes to our privacy notice.

### **Contact Information**

Please address questions, comments, and requests regarding this privacy notice and our privacy practices to [compliance@animocabrands.com](mailto:compliance@animocabrands.com).

Details of our data protection officer:

Compliance Officer

28/F Landmark South, 39 Yip Kan St, Wong Chuk Hang Hong Kong  
Unit B2, 1st Floor, Surrey Wing, 180 Strand London WC2R 1EA U.K.  
[Compliance@animocabrands.com](mailto:Compliance@animocabrands.com)