

Effective Date: March 23, 2026

BREEZE LABS PRIVACY POLICY

This Privacy Policy describes the types of information gathered by (i) Breeze Labs Inc., (ii) BEAMO EUROPE SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (Company No. PL5213993418), and (iii) Breeze Labs CA Ltd. (in each case, "Breeze", "us", "our", or "we") in the process of providing the services described in our Terms of Service (the "Terms"), available at <https://www.breeze.cash/terms-of-service> (the "Services"); how we use the information; with whom the information may be shared, what choices are available to you regarding collection; use and distribution of information; and how we protect the information you provide to us through the Services.

By using the Services, you hereby consent to allow us to process information in accordance with this Privacy Policy. Terms defined in the Privacy Policy that are not defined herein shall have the same definition as in the Terms.

This Privacy Policy is subject to change. If our information retention or usage practices change, we will let you know by posting the revised Privacy Policy on our website or otherwise making you aware of the changes. Your continued use of the Services following our changes to this Privacy Policy means you accept such changes. Please refer to the "Effective Date" above to see when this Privacy Policy was last updated.

The Terms governing your use of the Services contain important provisions disclaiming and excluding our liability and the liability of others regarding your use of the Services and provisions determining the applicable law and exclusive jurisdiction for the resolution of any disputes regarding your use of the website. Each of those provisions also applies to any disputes that may arise in relation to this Privacy Policy and the collection, use and disclosure of your personal information, and are of the same force and effect as if they had been reproduced directly in this Privacy Policy.

1. Who Collects Your Information On Our Services?

We do. Under the GDPR, Breeze is what is known as a "Controller" of the Personal Data/personal information that you provide us with. We collect information from you on the Services, and we are responsible for the protection of your information.

2. What Information Does Breeze Collect?

A. Personal Information. We collect certain personal information about you, which may be supplied when you register for the Services, when you create or update an account, when you use the Services, when you request the Services, and otherwise when you submit such information. "Personal information" is any information that identifies or reasonably could be linked to a particular person or household. The types of personal information we collect and save include:

- Contact and/or account information, such as your name, physical address, phone number, email address, and username, and other location information;
- Technical information collected in our logs, such as standard web log entries that contain your IP address, first- and third-party cookies, web beacons, page URL and timestamp.

You may also provide us with information when you interact with us by phone, email, through any online chat feature, submit a review or a post, or through other use of the Services. We may retain such information in order to provide you with the Services or improve the Services.

B. Non-personal Information. Non-personal information is non-personally identifiable or anonymous information about you, including but not limited to browser information, the pages accessed most frequently, how pages and features are used, time spent on a page, when and how you use the Services, applications downloaded, search terms entered, and similar non-personal data.

Automatically tracking Internet Protocol (IP) addresses is one method of automatically collecting information about your activities online and information volunteered by you. An IP address is a number that is automatically assigned to your device whenever you surf the internet. Further, the Services may utilize web beacons, pixel tags, third-party cookies, embedded links, and other commonly used information-gathering tools.

If non-personal information is paired with any of your personally identifiable information (“PII”), we will treat the non-personal information as if it were also PII.

C. Aggregate Information. We may also collect anonymous, non-identifying and aggregate information, the date and time of any request you make, your language preference, pages you visit, the referring website, the website you go to immediately after visiting the Services, and the domain name of your Internet service provider.

D. Payment Information. If you choose to save a payment method, we may collect and retain the information necessary to enable that payment method to be used for future transactions. This may also include authorization for recurring charges if you enroll in a subscription plan. Such information is collected and stored through our third-party service providers and is used only to process payments you authorize. You may remove a saved payment method or cancel a subscription at any time through your account settings or by contacting the applicable merchant.

E. Biometric Data. We and our identity-verification service provider(s) may collect and process biometric information derived from the government-issued ID documents and selfies you submit (such as facial geometry) only for the purposes of verifying your identity, preventing fraud, and meeting our legal obligations.

Biometric information is not sold, shared, or used for advertising, and it is not used to train algorithms or models.

Our service providers store biometric information only for as long as necessary to complete identity verification or as required by law, after which it is permanently deleted. Unless a longer retention period is legally required, biometric information will be deleted within three years of your last interaction with the Services.

Where required by applicable law, we will obtain your consent before collecting biometric information.

3. Why Is My Information Being Collected?

We accept and gather information to provide the Services to you and to refine the Services. We collect your personal information so that we can respond to your requests for information, to be added to our email lists, to enforce our Terms, or to otherwise provide the Services. Our third-party vendors collect your PII to comply with our obligations under applicable laws and regulations including, but not limited to, Know Your Business (“KYB”) and Know Your Customer (“KYC”) regulations. We collect aggregate information to help us better design the Services. We collect log information for monitoring purposes to help us to diagnose problems with our servers, administer the Services, calculate usage levels, and otherwise provide services to you. We also collect information to keep the Site safe and secure, for example for fraud monitoring and prevention, and to protect others from harm or abuse.

4. How Do We Use the Information We Collect?

A. We use the personal information you provide for the purposes for which you have submitted it, including:

- **Internal Uses.** We may use your PII to respond to your inquiries, to fulfill your requests for information, track usage trends, conduct experiments, develop and improve the Services and other offerings, and perform research and analytics.
- **Creating and Maintaining Your Account.** We use your PII to create and maintain an Account for you in connection with the Services.
- **Processing Transactions.** We use your PII to process Transactions you make through the Services.
- **Complying With Applicable Laws and Regulations.** Our third-party vendors collect and verify your PII to comply with applicable laws and regulations and to reduce identity theft and fraud.
- **Communicating With You About Our Services.** We may use your PII to send you information about new Services and other items that may be of interest to you.
- **Sending Administrative and Promotional Emails.** We may use your PII to send you emails to: (a) confirm your account information and your other PII; (b) process your transactions to purchase our Services; (c) provide you with information regarding the Services; (d) inform you of changes to this Privacy Policy, our Terms, or our other terms, conditions, or policies; or (e) provide you with information on our other Services and products, or promotions related to the Services or our other Services and products.

B. We may use anonymous information that we collect to improve the design and content of our Services, and to enable us to personalize your internet experience. We also may use this information in the aggregate to analyze how our Site is used, as well as to offer you programs or Services. We may use any anonymous, aggregate information, which may include or be based on your information, without restriction.

5. Do We Share Your Personal Information?

We will share your personal information in accordance with applicable law: (a) for the purposes for which you provided it; (b) with your consent; (c) as may be required by law (including, but not limited to, our compliance with our obligations under KYB, KYC, and other applicable laws) or as we think necessary to protect our organization or others from injury (e.g., in response to a court order or subpoena, in response to a law enforcement agency request, or when we believe that someone is causing, or is about to cause, injury to or interference with the rights or property of another); (d) with persons or organizations with whom we contract to carry out operations or business activities; or (e) as otherwise necessary to provide the Services or to improve the Services.

We may also share aggregate information with others, including affiliated and non-affiliated organizations.

Finally, we may transfer your PII to a third party, or an actual or potential purchaser, buyer, or successor-in-interest, in relation to, or in the event of, an actual or potential merger, acquisition, sale of all or substantially all of our assets, reorganization, bankruptcy, or other change of control. After

such disclosure or transfer, the third party or successor in interest may use the information in accordance with applicable law.

6. How Can You Access And Control Your Information?

After becoming a user of the Services, you may revise or edit your information through your Account, or by sending us an email to privacy@breeze.cash. It is important that the personal information we have about you is accurate. For instructions on how you can further access your personal information that we have collected, or how to correct errors in such information, please send an e-mail to privacy@breeze.cash. We will also promptly stop using your information and remove it from our servers and database at any time upon your e-mail request to do so to the extent permitted by applicable law. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access, making corrections, or removing your information. You may also opt-out of any promotional emails via the unsubscribe link in any such promotional email.

7. How Do We Store and Protect Your Information?

A. Data Security

We use administrative, technical, and physical safeguards designed to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction. These measures include encryption, access controls, firewalls, and other industry-standard security practices. While no method of transmission or storage is completely secure, we maintain safeguards appropriate to the nature of the information we process.

If you access the Services from outside the United States, you understand that your information will be transferred to and stored on servers located in the United States.

B. Data Storage

Personal information that we collect is stored on secure servers and systems operated either by Breeze or by carefully selected third-party service providers who act on our behalf. Our service providers are contractually required to protect personal information and use it only for the purposes for which it is shared with them.

C. Data Retention

We retain PII only for as long as reasonably necessary to provide the Services, comply with legal and regulatory requirements, prevent fraud, resolve disputes, and enforce our agreements. Different categories of data are retained for different periods depending on why they were collected.

- **Account Information** (such as contact details and profile information) is kept while your account is active and as required for legal, tax, audit, or compliance purposes.
- **KYC/KYB and Identity Verification Information**, including government ID information processed by our verification vendors, is retained only for the period required to satisfy legal obligations, fraud-prevention requirements, or platform partner requirements.

- **Biometric Information** is retained only as described in the “Biometric Information” section of this Privacy Policy and deleted once the purpose of collection is complete or within the legally required timeframe.
- **Payment-Related Information (including tokenized payment method data)** is retained by our PCI-compliant payment processors in accordance with their policies; Breeze does not store full payment card numbers.
- **Technical Logs and Security Records** are kept only for the period necessary to ensure the security, integrity, and performance of our Services and to detect, investigate, or prevent fraud or abuse.

When personal information is no longer required for these purposes, we will delete it or de-identify it in accordance with applicable law.

8. How Do We Use Cookies And Other Network Technologies?

A. To enhance your online experience with us, our web pages may presently or in the future use "cookies." Cookies are text files that our web server may place on your computer or mobile device to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other PII unless you choose to provide this information to us. Once you choose to provide PII, however, this information may be linked to the data stored in the cookie. Although it may be possible to turn off the collection of cookies through your device or browser, certain features of the Services may not function properly without the aid of cookies.

B. Our Services use Google Analytics, provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 (“Google”). Google Analytics uses cookies and similar technologies to collect and analyze information about your use of the Services and report on activities and trends. This service may collect information regarding the use of other websites, apps and online resources. For more information on how Google uses data when you use the Services, please follow this link: <https://policies.google.com/technologies/partner-sites>. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at, <https://tools.google.com/dlpage/gaoptout>. For more information about interest-based ads, or to opt-out of having your web browsing information used for behavioral advertising purposes, please visit <http://optout.aboutads.info>.

C. Breeze or its service providers may also use "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") in connection with some of our Site pages and HTML-formatted email messages for purposes of, among other things, compiling aggregate statistics about website usage and response rates. A Pixel Tag is an electronic image, often a single pixel (1x1), that is ordinarily not visible to website visitors and may be associated with cookies on visitors' computers or mobile devices. Pixel Tags allow us and our service providers to count users who have visited certain pages of our Site, to deliver customized services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, Pixel Tags can inform the sender of the email whether and when the email has been opened.

D. As you use the internet, you leave a trail of electronic information at each website you visit. This information, which is sometimes referred to as "clickstream data", can be collected and stored by a website's server. Clickstream data can reveal the type of computer and browsing software you use and the address of the website from which you linked to our Site. We may use clickstream data as a form of non-personally identifiable information to determine how much time visitors spend on each

page of our Site, how visitors navigate through the Site, and how we may tailor our web pages to better meet the needs of visitors. We will only use this information to improve the Services.

E. Do Not Track. At present, the Services do not specifically respond to browser do-not-track signals.

9. Collection of Information by Others.

This Privacy Policy is only applicable to our Services. If you obtain any additional goods and services from Platforms or other third-parties, you should check their privacy policies to learn how they collect, use, store and share information that you may submit to them or that they collect.

For example, the Services may include links to blogs, social media, and third-party websites. These third-party sites have their own privacy policies and terms of use and are not controlled by this Privacy Policy or the Terms. You should carefully review any terms, conditions and policies of such third-party sites before visiting them or supplying them with any personal information. If you follow a link to any third-party site, any information you provide that site will be governed by its own terms of use and privacy policy and not this Privacy Policy.

We are not responsible for the privacy or security of any information you provide to a third-party website or the information practices used by any third-party site, including links to any third-party site from the Services. We make no representations, express or implied, concerning the accuracy, privacy, safety, security or the information practices of any third-party site. The inclusion of a link to a third-party site in the Services does not constitute any type of endorsement of the linked site by us. We are not responsible for any loss or damage you may sustain resulting from your use of any third-party website or any information you share with a third-party website.

10. 'EEA' Privacy Rights.

If you reside in the European Economic Area ("EEA"), the United Kingdom ("UK"), or Switzerland, you have certain rights regarding your "Personal Data" under the EU General Data Protection Regulation ("EU GDPR") and the UK General Data Protection Regulation ("UK GDPR"). For purposes of these laws, Breeze is the "Controller" of your Personal Data when you use the Services.

A. Legal Bases for Processing

We process Personal Data under one or more of the following legal bases:

1. Performance of a Contract

To provide the Services, create and manage your account, process transactions, and respond to your requests.

2. Compliance with Legal Obligations

To conduct identity verification, KYC/KYB checks, prevent fraud, maintain security, and comply with applicable laws and regulatory requirements.

3. Legitimate Interests

To improve and secure the Services, perform analytics, communicate with you about updates, and enforce our Terms. We balance these interests against your rights and reasonable expectations.

4. Consent

When required by law—for example, for certain categories of Sensitive Personal Data or where consent is needed for specific optional features. You may withdraw consent at any time by contacting us.

B. Your GDPR Rights

Individuals in the EEA, UK, and Switzerland have the following rights (subject to certain limitations in the law):

- **Right of Access** – You may request a copy of the Personal Data we hold about you.
- **Right to Rectification** – You may request correction of inaccurate or incomplete information.
- **Right to Deletion** – You may request deletion of your Personal Data when it is no longer needed or when processing is unlawful.
- **Right to Restrict Processing** – You may request that we limit the processing of your Personal Data under certain circumstances.
- **Right to Data Portability** – You may request a copy of your Personal Data in a structured, commonly used, machine-readable format.
- **Right to Object** – You may object to processing based on legitimate interests, including certain forms of profiling.
- **Right not to be Subject to Automated Decision-Making** – We do not engage in automated decisions that have legal or similarly significant effects on you.

You may exercise these rights by contacting: privacy@breeze.cash.

We may request additional information to verify your identity before processing your request.

C. International Transfers

Your Personal Data may be transferred to and processed in the United States, where data protection laws may differ from those in your jurisdiction. Your Personal Data may be processed by employees or by other third-parties who work for us, or by the representatives and employees of our parent, affiliate, or other subsidiary companies.

When we transfer Personal Data outside the EEA, UK, or Switzerland, we rely on: European Commission Standard Contractual Clauses (“SCCs”), UK International Data Transfer Addendum, or Other legally recognized transfer mechanisms. These safeguards ensure your Personal Data receives a level of protection consistent with applicable law.

We only share Personal Data with third parties who adequately implement appropriate technical and organizational measures and who guarantee the protection of your rights as required under the laws that apply to you.

D. Complaints

If you believe we have processed your Personal Data unlawfully or inconsistently with this Privacy Policy, you may contact us at privacy@breeze.cash, or file a complaint with:

Your local data protection authority in the EEA;
The UK Information Commissioner’s Office (ICO);
The Swiss Federal Data Protection and Information Commissioner (FDPIC).

11. Children and Young People’s Information.

We do not knowingly collect any information from any minors, and we comply with all applicable privacy laws including the GDPR, the USA’s Children’s Online Privacy Protection Act (“COPPA”) and associated Federal Trade Commission (“FTC”) rules for collecting personal information from minors.

Please see the FTC's website (www.ftc.gov) for more information. If you have concerns about our Site, wish to find out if your child has accessed our Services, or wish to remove your child's personal information from our servers, please contact us at privacy@breeze.cash. Our Site will not knowingly accept personal information from anyone under 13 years old in violation of applicable laws, without consent of a parent or guardian. In the event that we discover that a child under the age of 13 has provided PII to us, we will make efforts to delete the child's information in accordance with COPPA. If you believe that your child under 13 has gained access to our Site without your permission, please contact us at privacy@breeze.cash.

12. California Privacy Rights

This section applies only to residents of California. The California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), provides California residents with specific rights regarding their "Personal Information" ("PI"). This section describes the categories of PI we collect, the purposes for which we use it, and your rights under California law.

A. Categories of Personal Information We Collect

In the past 12 months, Breeze has collected the following categories of Personal Information:

- **Identifiers**
Examples: name, username, email address, mailing address, phone number, IP address, device identifiers.
- **Customer Records Information**
Examples: account details, transaction history, payment method tokens (stored by our payment processors), and communications you send us.
- **Commercial Information**
Examples: records of digital goods or services purchased through the Services.
- **Internet or Other Electronic Network Activity Information**
Examples: device data, log files, browser information, cookies, usage data, referring/exit pages.
- **Geolocation Information**
Approximate location derived from your IP address.
- **Professional/Business Information**
If you are a business or platform partner, we may collect KYB information you provide.
- **Sensitive Personal Information (SPI)**
Only as required to verify your identity or prevent fraud, such as:
 - Government-issued ID information (processed by our verification vendor)
 - Biometric information derived from ID documents and selfies used solely for identity verification
 - Account log-in information (username + hashed password)

B. Categories of Sources

We collect PI from:

- You, when you create an account or use the Services

- Your device/browser
- Identity verification vendors (for KYC/KYB)
- Payment processors
- Analytics providers

We do **not** collect PI from data brokers.

C. Purposes for Collecting and Using Personal Information

We use Personal Information for the following business purposes:

- Providing, maintaining, and improving the Services
- Creating and managing user accounts
- Processing transactions
- Identity verification, KYC/KYB checks, and fraud prevention
- Customer support and communications
- Debugging, analytics, and service enhancement
- Security, incident detection, and compliance with law
- Enforcing our Terms and preventing illegal or harmful activities

We do **not** use Sensitive Personal Information for inferring characteristics about you.

D. Disclosure of Personal Information

We may disclose the categories of PI listed above to:

- **Service Providers** (identity verification platforms, payment processors, analytics providers, hosting vendors)
- **Affiliates**
- **Professional advisers** (legal, compliance, audit)
- **Government authorities or law enforcement**, when required
- **Successors** in connection with corporate transactions

We **do not sell** Personal Information and **do not share** Personal Information for cross-context behavioral advertising.

We do not sell or share mobile phone information with third-parties for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

E. Retention of Personal Information

We retain each category of PI only for as long as reasonably necessary to:

- Provide the Services
- Meet legal, regulatory, fraud-prevention, and compliance requirements
- Maintain business records

Retention periods vary depending on the category of data and legal obligations. Biometric data is retained only for the period required to complete identity verification or as otherwise required by law.

F. Your Rights Under the CPRA

California residents have the following rights:

Right to Know / Access

You may request that we disclose the categories and specific pieces of Personal Information we have collected about you.

Right to Delete

You may request deletion of your Personal Information, subject to legal exceptions.

Right to Correct

You may request that we correct inaccurate Personal Information.

Right to Opt Out of “Sale” or “Sharing”

Breeze does **not** sell or share Personal Information (including for cross-context behavioral advertising).

Right to Limit Use of Sensitive Personal Information

SPI is used *only* for identity verification, fraud prevention, security, and legal compliance. Because we do not use SPI for any other purpose, this right does not apply.

Right to Non-Discrimination

We will not discriminate against you for exercising your CPRA rights.

G. Submitting Requests

You may submit access, deletion, or correction requests by emailing:

privacy@breeze.cash

To protect your information, we will verify your identity before processing your request.

Authorized agents may submit requests on your behalf if permitted by law.

H. Shine the Light Notice

California residents have the following additional rights regarding disclosure of your Personal Information to third parties for their own direct marketing purposes:

We provide California residents with the option to opt-in to sharing of "Personal Information" as defined by California's "Shine the Light" law with third parties, other than with our affiliates, for such third parties' own direct marketing purposes. We do not share Personal Information with non-affiliate third parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law and/or withdraw previously given consent to sharing with on-affiliate third parties for their direct marketing purposes by contacting us using the methods in the "Contact Us" section below. Requests must include "California Marketing Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the provided e-mail address or mailing address.

13. Nevada Privacy Rights

If you are a Nevada resident, we do not “sell” personal information as defined in the Nevada Privacy of Information Collected on the Internet from Consumers Act as amended by Nevada Senate Bill 220. Nonetheless, you may submit a request to prohibit such sales by contacting us at privacy@breeze.cash. Additional information on the categories of personal information collected and categories of personal information shared with third-parties can be found in this Privacy Policy. If you would like to tell us not to sell your information in the future, please email us at privacy@breeze.cash with your name, postal address, telephone number, and email address with “Nevada Do Not Sell” in the subject line.

14. Contact Information

If you have any questions or suggestions regarding our Privacy Policy, please contact us via e-mail at privacy@breeze.cash.