# **BitSky Privacy Policy**

Last Updated: 17 March 2025

#### 1. Introduction

Welcome to the BitSky software and related services!

BitSky is a Web3.0 social platform developed and operated by BitSky Pte. Ltd. (the "Company" or "we"). The platform offers features, including information sharing, community content creation, messaging, address lookup, and activity monitoring based on blockchain technologies, as well as other products and/or services we may provide from time to time in the future (collectively, the "Services").

When you use our Services, we collect, use, store, and share certain information about you. This Privacy Policy outlines in detail how we handle your data, including collection, usage, storage, and sharing practices, as well as how you can access, update, manage, and protect your information. By using or continuing to use our Services, you acknowledge and agree to all terms outlined in this Privacy Policy.

If you have any questions regarding this policy or related matters, please contact our Data Protection Officer (DPO) at <a href="mailto:services@bitsky.im">services@bitsky.im</a>.

## 2. Scope of the Privacy Policy and Access Instructions

- **2.1 Scope of Application:** This Privacy Policy applies to all Services provided by this application. Unless otherwise specified, the information processing rules outlined in this policy apply solely to data that we directly collect, store, and use. They do not extend to third-party services accessed through this application (such as social media platforms or external websites). For information collected and processed by third-party services, please refer to their respective privacy policies. Certain terms used in this policy have the same meanings as those defined in the *BitSky User Agreement*.
- **2.2 How to Access:** You can access the latest version of this Privacy Policy anytime via the 'My Account > Settings > Privacy Policy' section within the application or by clicking the "Privacy Policy" link in the footer of the homepage. If you have any questions, please feel free to contact our Data Protection Officer (DPO) at <a href="mailto:services@bitsky.im">services@bitsky.im</a>.

# 3. Information Collection

To provide you with better Services, we collect only the minimum data necessary for service provision. We do not collect sensitive data, such as health information or biometric identifiers.

# 3.1 Information Provided by Users

 Registration and Account Information: When registering an account and using our Services, you may be required to provide an email address or authorize and verify your wallet address through a third party. After registration, you can further personalize your account by providing additional optional information, such as a nickname, profile picture, gender, and date of birth (non-mandatory), to replace the system-generated defaults.

- Deposits: When you make a deposit, we collect your transfer address, blockchain type, currency, and amount to record and display the transaction. Your wallet address, transfer address, blockchain type, deposit currency, and deposit amount are accessed only with your explicit authorization. We do not store private keys or mnemonic phrases in any form. Our platform solely provides on-chain data display Services, and you are fully responsible for the security of your assets.
- Uploaded and Shared Content: Any photos, locations, videos, texts, lists, or other content you post or upload to community or chat sections within the app may be publicly displayed or used to personalize your service experience.

# 3.2 Information Collected Automatically

- Log and Device Information: When you use this application, we automatically collect technical data, including but not limited to your IP address, device model, and other configuration details. Additionally, we record your usage activity, such as login times and upload timestamps.
- Social Interaction Information: We track interactions with other users while using the Service, including follows, likes, comments, and saved content.
- Chat Information: Please note that the chat feature in this application is designed with end-to-end encryption. This ensures that messages exchanged between you and other users cannot be decrypted, accessed, or stored during transmission. We do not store or analyze chat content.

## 3.3 Cookies and Similar Technologies

We use cookies, web beacons, device identifiers, SDKs, and other tracking technologies, including operating system and version details, system configuration information, device and application identifiers, browser type and version, hardware model, Internet service provider, mobile carrier, as well as IP addresses (or proxy servers). These technologies serve the following purposes:

- Enhancing Personalization Remembering your identity and preferences to provide a more personalized experience.
- Analyzing User Behavior Understanding how you interact with the application and its features to improve our products and Services.
- Optimizing Ad Placements Displaying more relevant advertisements based on your usage habits.

You may manage or disable cookies through your browser or device settings. However, doing so may affect certain functionalities of the application.

## 3.4 Third-Party Data Collection

To enable account verification, online payments, advertising services, and other functionalities, we may integrate third-party SDKs, APIs, or other tools. In some cases, these third parties may collect certain information directly. While we make every effort to ensure compliance with applicable laws and obtain your consent where required, we recommend reviewing the privacy policies of these third-party service providers for details on their data collection practices. The collection and processing of your data by third parties are subject to their respective privacy policies.

#### 4. Use of Collected Information

The information we collect is used for the following purposes:

- Service Delivery and Security: Ensuring identity verification, account security, customer support, fraud detection, data archiving, and backup to provide you with a secure and reliable product and service experience.
- Service Optimization and Improvement: Analyzing usage data to develop new features, enhance existing Services, and improve overall user experience.
- Personalized Experience: Tailoring and optimizing the content and advertisements you
  receive based on your preferences, language settings, location, and other relevant factors
  to better suit your needs.
- Marketing and Promotional Communications: With your explicit consent, we may send you promotional messages, surveys, or notifications via email, push notifications, or other communication channels. You may opt out at any time by following the unsubscribe instructions provided.
- Software Certification and Management: Authenticating, upgrading, maintaining, and troubleshooting software to ensure the stable operation of our products. With your explicit consent, we may use data collected from one Service to enhance another, ensuring compliance with all applicable laws and this Privacy Policy.

## 5. Data Sharing

## 5.1 Sharing of Personal Data with Third Parties

We, along with our affiliated companies, will only share your personal information under the following circumstances:

- Service Cooperation: To deliver our Services, we may share your information with affiliated companies, partners, third-party service providers, contractors, or agents (e.g., for email notifications, customer support, etc.), strictly for the purpose of enhancing your service experience. This does not constitute a "sale" of your personal data.
   For instance:
  - When you access third-party mini-games via our platform, we may provide the game service provider with your user ID, nickname, avatar, account balance, and

account level to enable proper functionality.

- When using the 007TG feature to purchase or access third-party enterprise SaaS services, we may collect and share your IP address and device location with the third-party provider to ensure service functionality.
- Legal and Regulatory Compliance: We may disclose certain information to comply with applicable laws, regulations, court orders, or government requests.
- Business Transactions: In the event of a merger, acquisition, asset transfer, or similar business transaction, your data may be transferred as part of the process. Where applicable, we will provide prior notice.

#### 5.2 Cross-Border Data Transfers

Your personal data is stored on local servers in Singapore and is not shared or transferred across borders. Should international transfers be required in the future, we will implement robust legal and security measures to protect your data.

If data transfers outside Singapore are required (e.g., for overseas cloud services), we will ensure the recipient adheres to equivalent data protection standards. This may include Standard Contractual Clauses (SCCs), encryption, or other legally recognized safeguards. Where necessary, we will obtain your explicit consent before proceeding.

BitSky is headquartered in Singapore. If you access our Services from outside Singapore, your data may be transferred to and processed within Singapore. We use SSL encryption and Standard Contractual Clauses to protect cross-border data transmissions and ensure compliance with applicable laws. If you use our Services from outside Singapore, you do so at your own risk and must comply with the laws of your jurisdiction.

#### 6. Data Security and Management

## 6.1 Security Measures

We employ a multi-layered security framework to protect your personal data. Our measures include SSL encryption, encrypted data storage, strict access controls, regular security audits, and proactive risk assessments, to minimize the risk of data loss, misuse, or unauthorized access. However, as electronic transmission and storage technologies on the Internet cannot guarantee 100% security, we cannot assure that hackers, cybercriminals, or other unauthorized third parties will never breach our security protocols to collect, access, steal, or alter your information.

Despite these risks, we are committed to protecting your personal data to the fullest extent possible. By using our app, you acknowledge that data transmission carries inherent risks, and you should access the app in a secure environment.

#### 6.2 Data Retention

We retain your personal data only for the period necessary to fulfill the purposes outlined in this Privacy Policy or as required by applicable laws and regulations. Once your account is deactivated, we will promptly delete or anonymize your information in accordance with legal

requirements. However, certain data may be temporarily retained due to backup systems or other unavoidable circumstances.

# 7. User Rights and BitSky's License

We respect and uphold your privacy rights.

## 7.1 Your Rights

- Right to Access You have the right to request information about the personal data we have collected about you.
- Right to Rectification You may request corrections to any inaccurate or incomplete data.
- Right to Deletion You can request the deletion of your personal data, except for information that must be retained as required by law.

## 7.2 BitSky's Rights

BitSky holds all intellectual property rights related to its Services, including copyrights, trademarks, domain names, logos, trade dress, trade secrets, patents, and other proprietary rights. Without prior written permission, you are not permitted to use these rights.

To report an infringement, please contact our Data Protection Officer (DPO) at <a href="mailto:services@bitsky.im">services@bitsky.im</a>.

#### 7.3 License Granted by BitSky

BitSky grants you a limited, revocable, non-exclusive, and non-transferable license to use our services in accordance with these terms.

## 8. Minor Usage Policy

Due to the nature of virtual assets, we do not encourage minors to register as users or use our platform Services. We do not knowingly collect information from individuals under the age of 18.

If you are a parent or guardian and discover that a minor has registered and provided information without your consent, please contact us. We will delete the relevant data within seven (7) business days.

# 9. Exceptions to the Privacy Policy

This Privacy Policy applies only to the information that we directly collect, process, and store. It does not cover:

- Information collected by third-party services accessed through this application (such as social media or external websites).
- Information collected by other companies or institutions through advertisements or other means within this application.

Therefore, when using third-party services, please review their respective privacy policies and terms of service.

## 10. Changes to the Privacy Policy

- We may revise this Privacy Policy from time to time to comply with legal regulations, accommodate business developments, or reflect technological updates. In the event of significant changes, we will notify you in advance through a prominent notice on the application's homepage or via email.
- The revised Privacy Policy will take effect upon publication. We encourage you to review it periodically to stay informed. If you do not agree with the changes, you may discontinue using our Services and request to delete your account.

#### 11. Account Deletion

You can request to delete your account through the app by navigating to:

 $[My] \rightarrow Tap$  the top-right menu  $\rightarrow$  [Settings]  $\rightarrow$  [Account & Security]  $\rightarrow$  [Delete Account]. Before processing your request, we will verify your identity, security status, and device information.

⚠ Please note: Account deletion is irreversible. While we will only retain data as required by this policy or applicable laws, on-chain data (such as your wallet address hash) cannot be deleted as it is part of the public blockchain. However, off-chain associated data (except for legally or business-required records) will be deleted or anonymized within 30 days.

#### 12. Contact Us

If you have any questions regarding this Privacy Policy, you may contact us through the following channels:

- Official Website: <a href="https://bitsky.im/">https://bitsky.im/</a>
- Data Protection Officer (DPO) Email: services@bitsky.im
- In-App Support: Navigate to [My] → [Settings] → [Suggestions & Feedback] to leave a
  message.

# **Appendix 1: Third-Party Services**

To provide certain Service functionalities, this application may integrate third-party services (e.g., data analytics, advertising, etc.). For details regarding these third parties and their privacy policies, please refer to the Privacy Settings section within the application or the table below.

SDK Name	Collected Information	Purpose	Provider	Privacy Policy
Google SDK	Google account authorization	Account login integration	Google	https://policies.google.com/pri vacy?hl=zh-CN
Ali OSS / Ali Player / Ali SLS	User-submitted images, videos, and in-app interactions	App functionality and user behavior analytics	Alibaba Cloud	https://terms.aliyun.com/legal- agreement/terms/suit_bu1_ali_ cloud/suit_bu1_ali_cloud2021 07091605_49213.html
Firebase	Error logs	Error tracking and diagnostics	Firebase	https://firebase.google.com/support/privacy?hl=zh-cn
JPush	Push notification data	Notification delivery	Jiguang	https://www.jiguang.cn/license/privacy