



PRIVACY POLICY

Effective Date: December 15, 2025

INTRODUCTION

Welcome to the Metawin \$MWIN\$ Token Presale ("we", "our", "us"). We are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you visit our website (the "Website") and participate in the token presale (collectively, the "Services").

By using our Services, you acknowledge that you have read, understood, and agree to the practices described in this Privacy Policy.

1. PERSONAL INFORMATION WE COLLECT

1.1 Information You Provide to Us

We collect minimal personal information. You may voluntarily provide the following:

Contact Information:

- Email address (if you subscribe to updates, newsletters, or contact customer support)
- Name (if provided voluntarily for customer support purposes)
- Any information you choose to share when contacting us for assistance

Marketing Opt-In:

- Personal information is only collected if you voluntarily subscribe to marketing emails, newsletters, or updates
- You may unsubscribe at any time using the link provided in emails

Wallet Address:

- Your cryptocurrency wallet address when you connect your wallet to participate in the token presale
- Note: Wallet addresses and transactions are public and permanently recorded on the blockchain

Accuracy:

- It is your responsibility to ensure that any information you provide is accurate, current, and complete

1.2 Information We Automatically Collect

When you visit or use our Services, we may automatically collect certain technical information:

Identifiers:

- IP address
- Device ID and unique identifiers
- Device information (model, brand, operating system)
- Browser type and version
- Location data (general geographic location based on IP address)

Cookies and Similar Technologies:

- We use cookies, web beacons, log files, and similar tracking technologies to enhance your experience
- Cookies are small files stored on your device that enable certain features and functionality
- You can manage your cookie preferences through your browser settings
- Note: Refusing cookies may impact website functionality
- For more details, see our Cookies Policy (<https://token.metawin.com/cookies>)

Usage Data:

- Pages visited and time spent on the Website
- Click patterns and navigation paths
- Timestamps of interactions
- Referral sources (how you arrived at our Website)

1.3 Information from Third Parties

Third-Party Wallet Providers:

- If you connect a third-party wallet (e.g., MetaMask, WalletConnect, Coinbase Wallet), we may receive limited information such as your wallet address and transaction signatures
- Note: We do NOT have access to your private keys or the ability to control your wallet

Blockchain Data:

- All transactions made via wallet connections are public and permanently recorded on the blockchain
- Anyone can view wallet addresses, transaction amounts, and timestamps on public blockchain explorers
- We do not control or have the ability to delete blockchain data

Third-Party Authentication Services:

- If you use third-party authentication services (e.g., Web3Auth), we may receive your third-party account ID or email address

Analytics Providers:

- We use third-party analytics services (e.g., Google Analytics) to collect aggregated information about user activity
- This data helps us understand how users interact with our Website and improve our Services
- Analytics data is generally not personally identifiable

Third-Party Terms:

- Connecting your wallet or using third-party services may subject you to their respective terms and privacy policies
- It is your responsibility to review and agree to these third-party terms

2. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

To Provide and Maintain Our Services:

- Facilitate your participation in the token presale
- Process transactions and manage your account (if applicable)
- Respond to your inquiries and provide customer support
- Send important updates and notifications about the token presale

To Improve Our Website:

- Analyze user behavior and preferences to enhance user experience
- Optimize website functionality and performance
- Identify and fix technical issues

To Communicate with You:

- Send newsletters, updates, and announcements (if you opted in)
- Notify you of important changes to our Services or policies
- Respond to your questions and feedback

For Marketing Purposes:

- Inform you about products, services, and opportunities that may interest you (with your consent)
- Send promotional materials and special offers
- You may opt out of marketing communications at any time

For Security and Fraud Prevention:

- Detect and prevent fraudulent activity, abuse, and security threats
- Monitor compliance with our Terms and Conditions
- Protect the rights, property, and safety of our users and the public

To Comply with Legal Obligations:

- Comply with applicable laws, regulations, and legal processes
- Respond to lawful requests from government authorities
- Enforce our Terms and Conditions and other agreements

For Research and Analytics:

- Conduct research and analysis to improve our Services
- Generate aggregated, anonymized data for internal or external reporting

3. DISCLOSURE OF YOUR INFORMATION

We may share your personal information with third parties under the following circumstances:

3.1 Service Providers

We may share information with trusted third-party service providers who assist us in operating our Services, including:

- Payment processors and blockchain infrastructure providers
- Web hosting and cloud storage providers
- Email delivery and marketing automation services
- Customer support and communication platforms
- Analytics and data analysis providers

Service providers are contractually obligated to:

- Use your information only for the purposes we specify
- Maintain the confidentiality and security of your information
- Comply with applicable data protection laws

3.2 Business Transfers

In the event of a merger, acquisition, sale of assets, financing, or reorganization of our business, your information may be transferred to the acquiring entity. We will notify you via email or a prominent notice on our Website before your information is transferred and becomes subject to a different privacy policy.

3.3 Legal Requirements

We may disclose your information if required to do so by law or in response to:

- Valid legal processes (e.g., subpoenas, court orders, warrants)
- Requests from government authorities or regulatory agencies
- Investigations related to fraud, security threats, or illegal activity
- Protection of our rights, property, or safety, or that of our users or the public

3.4 With Your Consent

We may share your information with third parties if you provide explicit consent for us to do so.

3.5 Public Blockchain Data

As noted above, all transactions on the blockchain are public and permanent. Your wallet address and transaction history are visible to anyone with access to blockchain explorers. This information is NOT controlled by us and cannot be deleted or modified.

4. SECURITY OF YOUR INFORMATION

We take the security of your personal information seriously and implement reasonable administrative, technical, and physical safeguards to protect it, including:

Technical Measures:

- Encryption of data in transit (SSL/TLS)
- Secure servers and infrastructure
- Regular security audits and vulnerability assessments

Organizational Measures:

- Access controls and authentication requirements
- Employee training on data protection and security
- Policies and procedures to safeguard personal information

Limitations:

- Despite our efforts, no security system is completely infallible
- We cannot guarantee absolute security of your information
- Transmission of information over the internet is inherently risky
- You are responsible for maintaining the security of your wallet and private keys

Your Responsibility:

- Keep your wallet private keys secure and confidential
- Use strong passwords and enable two-factor authentication where available
- Be cautious of phishing attempts and fraudulent websites
- Notify us immediately if you suspect unauthorized access to your information

5. YOUR RIGHTS

Depending on your jurisdiction, you may have the following rights under data protection laws (e.g., GDPR, CCPA):

5.1 Right to Access

Request access to your personal data and information about how we use it.

5.2 Right to Correct

Request correction of any inaccurate, incomplete, or outdated personal data.

5.3 Right to Erase (Right to be Forgotten)

Request deletion of your personal data, subject to certain legal conditions and exceptions (e.g., if we need to retain data for legal compliance or fraud prevention).

Note: Data recorded on the blockchain CANNOT be deleted, as it is public and permanent.

5.4 Right to Restrict Processing

Request that we limit the processing of your personal data in certain circumstances.

5.5 Right to Data Portability

Request a copy of your personal data in a structured, commonly used, and machine-readable format, and have it transferred to another service provider where technically feasible.

5.6 Right to Object

Object to our processing of your personal data based on legitimate interests, direct marketing, or research purposes.

5.7 Right to Withdraw Consent

Withdraw your consent at any time where we are processing your personal data based on consent (e.g., marketing emails). This will not affect the lawfulness of processing conducted before withdrawal.

5.8 Exercising Your Rights

To exercise any of these rights, please contact us at support@metawin.com.

We may:

- Require additional information to verify your identity before processing your request
- Charge a reasonable fee for unfounded, repetitive, or excessive requests
- Refuse to comply with requests that are manifestly unfounded, excessive, or otherwise impermissible under applicable law

Response Time:

- We aim to respond to legitimate requests within **30 days**
- Complex requests may require additional time (up to 60 days), in which case we will notify you of the delay

6. DATA RETENTION

We retain your personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

Retention Periods:

- **Account and contact information:** Retained as long as your account is active or as needed to provide Services, plus any additional period required for legal compliance

- **Customer support records:** Retained for a reasonable period to resolve inquiries and for quality assurance
- **Marketing communications:** Retained until you unsubscribe or request deletion
- **Legal and compliance records:** Retained as required by applicable laws and regulations

Blockchain Data:

- Data recorded on the blockchain is permanent and cannot be deleted by us or anyone else

7. INTERNATIONAL DATA TRANSFERS

Our Services are operated from Panama. If you are located outside Panama, please be aware that your information may be transferred to, stored, and processed in Panama or other jurisdictions where our service providers operate.

By using our Services, you consent to the transfer of your information to countries outside your country of residence, which may have different data protection laws than your jurisdiction.

We take reasonable steps to ensure that your information is treated securely and in accordance with this Privacy Policy, regardless of where it is processed.

8. CHILDREN'S PRIVACY

Our Services are not intended for individuals under the age of 18. We do not knowingly collect personal information from children under 18.

If you are a parent or guardian and believe that your child has provided us with personal information, please contact us at support@metawin.com so we can delete the information.

9. THIRD-PARTY LINKS

Our Website may contain links to third-party websites, wallets, exchanges, or services that are not owned or controlled by us. This Privacy Policy applies only to our Services.

We are not responsible for the privacy practices or content of third-party services. We encourage you to review the privacy policies of any third-party services you visit or use.

10. COOKIES POLICY

10.1 What Are Cookies?

Cookies are small text files placed on your device by websites you visit. They are widely used to make websites work more efficiently and provide information to website owners.

10.2 Types of Cookies We Use

Essential Cookies:

- Required for the Website to function properly
- Enable basic features like page navigation and access to secure areas
- Cannot be disabled without affecting website functionality

Analytics Cookies:

- Help us understand how visitors interact with the Website
- Collect aggregated, anonymized information about page visits, traffic sources, and user behavior
- We use Google Analytics and similar services

Marketing Cookies:

- Used to track visitors across websites
- Enable us to display relevant advertisements and measure campaign effectiveness
- May be set by third-party advertising networks

10.3 Managing Cookies

You can control and manage cookies through your browser settings. Most browsers allow you to:

- View and delete cookies
- Block cookies from specific websites or all websites
- Clear cookies when you close your browser

Note: Disabling cookies may impact the functionality of our Website and prevent you from accessing certain features.

Browser Settings:

- Chrome: Settings > Privacy and Security > Cookies
- Firefox: Options > Privacy & Security > Cookies
- Safari: Preferences > Privacy > Cookies
- Edge: Settings > Privacy > Cookies

11. CONTACT US & COMPLAINTS

If you have any questions, comments, or complaints regarding this Privacy Policy or our data practices, please contact us at:

Email: support@metawin.com

11.1 Data Protection Authority

If you are located in the European Economic Area (EEA), United Kingdom, or another jurisdiction with a data protection authority, and you are dissatisfied with our response to your privacy concerns, you have the right to lodge a complaint with your local data protection authority.

12. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons.

Notice of Changes:

- We will post the updated Privacy Policy on this page
- The "Effective Date" at the top will be updated
- Material changes will be communicated via email (if we have your email address) or a prominent notice on the Website

Your Continued Use:

- By continuing to use our Services after changes become effective, you acknowledge and agree to the updated Privacy Policy
- We encourage you to review this Privacy Policy periodically

13. ACCEPTANCE OF POLICY

By using the Metawin \$MWIN\$ Token Presale Services, you acknowledge that you have read, understood, and agree to the terms of this Privacy Policy.

If you do not agree with this Privacy Policy, please do not use our Services.

END OF PRIVACY POLICY

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