

PRIVACY POLICY

4CAST PRIVACY POLICY

Last updated: 10th July 2024

1. Introduction

1.1 4Cast (the “Company”) is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use, and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

1.2 For purposes of this Agreement, “Site” refers to the Company’s website, which can be accessed at www.4cast.win.

1.3 “Service” refers to the Company’s services accessed via the Site, in which users can create and participate in prediction markets.

1.4 The terms “4Cast”, “4Cast Market”, “4Cast Protocol”, “we,” “us,” and “our” refer to the Company.

1.5 “User”, “You” and “Your” refers to you, as a user of our Site or our Service.

1.6 By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found on the platform), and you consent to our collection, storage, use, and disclosure of your Personal Information as described in this Privacy Policy.

1.7 This website-hosted user interface (this “Interface”) is made available by 4Cast Market (the “Company,” “us,” “we,” or “our”). This Privacy Policy (the “Policy”) governs the manner in which we make the Interface available and how we collect, use, maintain, and disclose information collected from our users (each, a “user,” “you,” or “your”) through the Company’s websites, including the Interface, web applications, mobile applications, and all associated sites linked thereto by the Interface, or by us or our affiliates (the “Site”). This Policy further applies to all information we collect through our Site and otherwise obtain in connection with products and Services, content, features, technologies, functions, and all related websites we may provide to you or to which we may provide access (collectively with the Site, the “Services”).

1.8 Please read this Policy carefully. We are committed to protecting your privacy through our compliance with the terms of this Policy.

1.9 Our Terms of Services (“Terms”) govern all use of our Services and, together with the Privacy Policy, constitute your agreement with us (the “Agreement”). If you do not agree with the terms of this Policy, please do not access our Site.

By accessing or using our Services, you agree to the terms of this Policy. Specifically, by

- using, visiting, or accessing the Services,
- using, accessing, establishing an account through or purchasing any of the Services, and/or
- clicking “accept,” “agree,” or “OK” (or a similar term) with respect to any of our Terms or similar policies, you consent and agree to be legally bound by each of the terms and conditions contained in this Policy.

1.10 In operating the Site and providing the Services, we may collect (and/or receive) certain information about you and your activities. You hereby authorize us to collect and/or receive such information to operate the Site and provide the Services.

2. Applicability

2.1 This Privacy Policy applies to all information we collect from you in connection with the Site and offering the Services. This Policy does not apply to information collected by us offline or through any other means, including on any other website made available by us or by any third party (including our affiliates and subsidiaries).

2.2 Throughout this Policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been aggregated and/or anonymized so that it does not identify a specific user. Personal Information may also include the personal information of third parties that may be contained in information you provide to us through your use of the Site.

2.3 Information Collection and Use

When you visit the Site and use the Services, we collect your IP address and standard web log information, such as your browser type and pages you accessed on our Site. We may also collect certain geolocation Information (as defined below). If you do not agree to our collection of this information, you may not be able to use the Services.

2.3.1 We collect information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Site. Information collected automatically may include usage details, IP addresses, and information collected through Cookies and other tracking technologies; and
- In certain instances, from third parties, such as our business partners, third-party providers (e.g., Phantom or MetaMask), or other networks where you have connected your account and authorized the Site to access this information.

If you create an account with us, we may collect the following information from you:

- **Personal Information.** Information by which you may be personally identified, such as your name, postal address, registration at place of residence, e-mail address, telephone number, date of birth, and other demographic information, such as your age, gender, hometown, and interests that you voluntarily provide to us as part of your registration with the Site to use our Service (collectively, “Personal Information”). There is no obligation for you to provide us with personal information of any kind, but your refusal to do so may prevent you from using the Services.
- **Derivative Information.** Information our servers may collect automatically when you access the Site, such as your IP address, browser type, operating system, access times, and pages you viewed directly before and after accessing the Site. This may also include other information about your internet connection and the equipment you use to access our Site, and usage details.
- **Financial Information.** If applicable to your use of the Site and the Services, in order for us to process payments of any fees owed to us in connection with your use of the Services and the Site, you will be required to provide certain bank account online login information, bank account and routing numbers, credit card information (e.g., card brand, expiration date, and credit-card numbers) and other data related to your payment method. You authorize our third-party payment vendors and digital wallet providers (e.g., Phantom or MetaMask) to collect, process, and store your Financial Information in accordance with their respective privacy policies.
- **Mobile Device Information.** If you access the Site from a mobile device we may obtain information automatically about you from your mobile device such as your device type, mobile device identification number, geolocation Information, time zone, language setting, browser type. If you provide it directly to us, we may also collect your telephone number.
- **Geolocation Information.** We collect information that identifies, with reasonable specificity, your location by using certain longitude and latitude coordinates obtained through GPS, Wi-Fi, cell-site triangulation, or other locational data. We may collect this data for fraud prevention and risk management purposes, among other reasons.
- **Correspondence and Recordkeeping.** We will retain records and copies of your correspondence (including e-mail addresses), if you contact us. We will retain all records for such time period as may be required by applicable law.
- **Surveys.** If you decide to participate in surveys available via the Services, you may be asked to provide certain information which may include personal information. We may store such responses.

2.3.2 We are committed to providing a safe and secure customer experience. As a result, before permitting you to use the Services, we may require additional information from you (including for instance government-issued identity documents such as passport number, driver's license details, or national identity card details) that we can use to verify your identity, address, or other information, prevent fraud or to manage risk and compliance throughout our

relationship.

2.3.3 Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with our customer support team.

3. Children Under the Age of 18

The Site and Services provided by 4Cast Market are strictly intended for users who are 18 years of age or older. We do not knowingly collect any personal information from individuals under 18. If you are under 18, please do not use or provide any information on this Site. Should we become aware that personal data from individuals under 18 has been inadvertently collected, we will take immediate steps to delete such information from our records, except where retention is required by applicable law.

4. Tracking Technologies and Cookies

4Cast Market uses Cookies and similar tracking technologies to monitor activities on our Site and to store certain information. These tracking technologies include beacons, tags, and scripts to collect and track data, which helps us improve and analyze our Services.

4.1 Cookies

Cookies are small files placed on the hard drive of your computer or mobile device. When you visit our Site or use our Services, we, along with certain business partners and vendors, may use cookies and other tracking technologies (collectively, "Cookies"). We use Cookies to recognize you as a customer, customize our Services, display personalized content and advertisements, measure the effectiveness of our promotions, perform a wide range of analytics, mitigate risks, prevent potential fraud, and promote trust and safety across our Services.

Most web browsers are set to accept cookies by default. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you choose to disable or decline Cookies, some parts of our Service may not function properly or may not be accessible.

Types of Cookies We Use:

4.1.1 Necessary / Essential Cookies

- Type: Session Cookies
- Administered by: Us
- Purpose: These Cookies are essential for providing you with services available through the Site and enabling you to use some of its features. They help authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services you have asked for cannot be provided.

4.1.2 Cookies Policy / Notice Acceptance Cookies

- Type: Persistent Cookies
- Administered by: Us
- Purpose: These Cookies identify if users have accepted the use of cookies on the Site.

4.1.3 Functionality Cookies

- Type: Persistent Cookies
- Administered by: Us
- Purpose: These Cookies allow us to remember choices you make when you use the Site, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personalized experience and to avoid you having to re-enter your preferences every time you use the Site.

4.1.4 Tracking and Performance Cookies

- Type: Persistent Cookies
- Administered by: Third-Parties
- Purpose: These Cookies are used to track information about traffic to the Site and how users interact with the Site. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor because it is typically linked to a pseudonymous identifier associated with the device you use to access the Site. We may also use these Cookies to test new advertisements, pages, features, or new functionality of the Site to see how our users react to them.

4.2 Web Beacons

Pages of our Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs). These allow us to count users who have visited those pages and gather other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). You may not decline web beacons specifically; however, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

4.3 Do Not Track

Do Not Track ("DNT") is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. You can enable or disable DNT by visiting the preferences or settings page of your web browser. We do not respond to DNT signals.

5. Use of Your Personal Data

5.1 The Company may use Personal Data for the following purposes:

- To provide and maintain our Service: Including to monitor the usage of our Service and ensure its proper functioning.

- To manage Your Account: To manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- For the performance of a contract: The development, compliance, and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with us through the Service.
- To contact You: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including security updates when necessary or reasonable for their implementation.
- To provide You with news and offers: To provide you with news, special offers, and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- To manage Your requests: To attend and manage your requests to us.

5.2 We may share your personal information in the following situations:

- With Service Providers: We may share your personal information with Service Providers to monitor and analyze the use of our Service, to show advertisements to you to help support and maintain our Service, to contact you, to advertise on third-party websites to you after you visited our Service, or for payment processing.
- For Business transfers: We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- With Major Shareholders: We may share your information with our major shareholders, in which case we will require those major shareholders to honor this Privacy Policy. Major shareholders include our parent company and any other subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- With Business partners: We may share your information with our business partners to offer you certain products, services, or promotions.
- With other users: When you share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If you interact with other users or register through a Third-Party Social Media Service, your contacts on the Third-Party Social Media Service may see your name, profile, pictures, and description of your activity. Similarly, other users

will be able to view descriptions of your activity, communicate with you, and view your profile.

6. How We Protect and Store Your Information

The security of your data is important to us. However, please be aware that no method of transmission over the Internet or method of electronic storage is completely secure. We strive to implement and maintain reasonable, commercially acceptable security measures designed to protect your personal information from unauthorized access, use, alteration, and disclosure.

6.1 Security Measures We Use Include:

- **Administrative Safeguards:** We implement and maintain policies and procedures to ensure that our staff understand and correctly apply the necessary measures to protect your personal information. We restrict access to personal information to those employees, contractors, and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations.
- **Technical Safeguards:** We use technical measures such as encryption, firewalls, and secure socket layer (SSL) technology to protect your personal information during transmission and storage.
- **Physical Safeguards:** We employ physical security measures to guard against unauthorized access to systems where we store personal data.

6.2 Additional Measures:

- **Access Controls:** We enforce access controls to our office and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities.
- **Regular Audits and Assessments:** We conduct regular security audits and assessments to ensure that our security practices are robust and up-to-date.

6.3 Despite our efforts, no security system is impenetrable, and we cannot guarantee the absolute security of our systems, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet. Therefore, we urge you to take adequate precautions to protect your personal information, including never sharing your password with anyone.

6.4 Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained in the Services.

7. How We Share Personal Information with Other Parties

7.1 We prioritize your privacy and aim to handle your personal information responsibly. However, there are certain situations where we may need to share your data with third parties.

7.2 Business Partners and Service Providers

We may share your information with our business partners to offer you specific products, services, or promotions. Additionally, we may use third-party service providers to help us operate and maintain our Site, and to provide our Services. These providers may access your personal information strictly to perform tasks on our behalf and are obligated not to disclose or use it for any other purpose.

7.3 Advertising Partners

We may work with third-party advertising companies to serve ads on our Site. These companies may use cookies and similar technologies to gather information about your visits to our Site and other websites to deliver advertisements that may be of interest to you. We do not control these third parties' use of your information for interest-based advertising. However, they may offer options for you to opt out of this data collection.

7.4 Public Information

Due to the decentralized nature of blockchain technology, some of your personal information may be publicly accessible. This can include your web3-enabled wallet's public address, username, profile photo, and details of public transactions you've been involved in. This information can be seen by anyone on the internet and may also be accessed, shared, or downloaded through APIs, SDKs, or third-party services integrated with our products.

7.5 Legal Requirements and Protection

We may disclose your personal information to law enforcement agencies, government officials, or other third parties if we are required to do so by law, such as through a subpoena or court order. Additionally, we may share information when it is necessary to comply with legal obligations, to protect our rights, property, or safety, or to prevent physical harm or financial loss.

7.6 Third-Party Services

If you authorize an account connection with a third-party service, we may exchange information directly with that third party. Examples of such connections include linking your account to a social media platform, a financial services provider, or allowing a merchant to charge your account. Information shared in these cases will be used and disclosed according to the third party's privacy practices. It is important to review the privacy policies of any third-party service before you authorize a connection.

7.7 Consent-Based Sharing

With your explicit consent, we may share your personal information with third parties for purposes not covered by this Privacy Policy. We will seek your permission before sharing sensitive information such as your credit card or bank account details unless required by law.

We are committed to ensuring that your personal information is shared in a secure manner and

only when necessary to provide you with the best possible service.

8. Third-Party Links

8.1 Our Services may include links to third-party websites, applications, or services that are not affiliated with us. These third-party sites operate independently and have their own privacy policies. When you click on a link to a third-party site, you will be directed to their website. We encourage you to review the privacy policy of every site you visit.

8.2 We do not control, and are not responsible for, the content, privacy policies, or practices of any third-party websites or services. Any information you provide to these third parties is not covered by this Privacy Policy. We cannot guarantee the safety and privacy of your information when you access third-party sites.

8.3 Third parties may also use cookies, web beacons, and other tracking technologies to collect information about you when you use our Services. This information may be used to provide you with targeted advertisements or other content based on your browsing activities and interests. We do not control these third parties' tracking technologies or how they may be used. If you have questions about an advertisement or other targeted content, please contact the responsible provider directly.

8.4 If you no longer wish to receive communications from third parties, you should contact the third party directly. We are not responsible for the privacy practices or content of these third-party services.

9. Third-Party Analytics and Retargets

9.1 We utilize third-party analytics services to better understand how you use our Services, to compile reports on usage activities, and to gather data for improving our Services. These third parties may employ cookies, pixel tags, and other tracking technologies to collect and analyze data about your interactions with our Site and Services.

9.2 By using our Services, you consent to the processing of your data by these analytics providers in accordance with this Privacy Policy.

9.3 In addition to analytics services, we may use third-party retargeting services to display advertisements to users who have previously visited our Site. These retargeting services may use cookies and similar technologies to serve ads based on your past visits and interactions with our Site.

9.4 These third-party services collect and use data according to their own privacy policies. We encourage you to review these policies to understand how your data will be handled. By using our Services, you consent to the processing of your data by these retargeting services providers as described in this Privacy Policy.

10. Transfer of Data

10.1 Your personal data may be transferred to and maintained on servers or databases located outside of your state, province, country, or other governmental jurisdiction where data protection laws may differ from those in your jurisdiction. By using our Services, you agree to this transfer of your information to other jurisdictions that may have different data protection regulations than those of your home country.

10.2 In certain situations, courts, law enforcement agencies, regulatory bodies, or security authorities in these other countries may have the right to access your personal data. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfer of your personal data will occur to an organization or country unless there are adequate controls in place to protect your data and other personal information.

10.3 We may share your personal data with third parties that provide us with various services to support our activities, including but not limited to:

- Storage and hosting services, including cloud computing solutions.
- User experience analysis.
- Customer relationship management (CRM) data management.
- Accounting and legal services.
- Research, analytical, technical, and diagnostic services.
- Business partners.
- Digital Assets wallet providers.

10.4 Additionally, we may disclose your personal data to governmental, local, or regulatory authorities as required by law or when necessary to protect our interests, rights, and assets, including the initiation, exercise, or defense of legal claims.

10.5 In the event of a business transaction, such as a merger, acquisition, reorganization, sale of assets, or bankruptcy, we may transfer your personal data to potential buyers, investors, or lenders, or to third parties involved in such transactions.

10.6 We may also share your personal data with other third parties with your explicit consent. Furthermore, we may share aggregated or de-identified information that does not identify you personally with third parties or affiliates for any purpose, except as prohibited by applicable law.

10.7 Your consent to this Privacy Policy followed by your submission of such information represents your agreement to these transfers and disclosures.

11. Your Rights in Respect of Personal Data About You

11.1 Depending on the jurisdiction in which you reside, you may have certain rights regarding your personal data. These rights are subject to the applicable laws in your region, and may not be absolute. Here are the rights you might be able to assert:

11.2 Right to Access: You have the right to request access to the personal data we hold about you.

11.3 Right to Rectification: If you believe that the information we hold about you is incorrect or incomplete, you have the right to request that we correct or update it.

11.4 Right to Erasure: Also known as the "right to be forgotten," you can request that we delete your personal data under certain circumstances.

11.5 Right to Restrict Processing: You have the right to request that we limit the processing of your personal data in certain situations.

11.6 Right to Object: You may object to the processing of your personal data if you believe that our processing is infringing on your rights. This includes the right to object to processing for direct marketing purposes.

11.7 Right to Data Portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to request the transfer of this data to another data controller.

11.8 Right to Withdraw Consent: If we are processing your personal data based on your consent, you can withdraw that consent at any time.

11.9 Right to Lodge a Complaint: You have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal data violates applicable law in your jurisdiction.

11.10 Please note that these rights may be subject to certain conditions and exceptions as per applicable data protection laws. We may require you to verify your identity before we respond to your request.

12. Return/Deletion of Personal Data

12.1 Upon your request, we will take the following steps to manage your personal data:

- **Return of Personal Data:** We will return all personal information processed in connection with the Services to you in a structured, commonly used, and machine-readable format. This includes providing you with any existing copies and backups of your personal data.
- **Deletion of Personal Data:** We will delete all personal information processed in connection with the Services, including any materials or media containing such personal information. This includes ensuring that all copies and backups of your personal data are permanently destroyed.

12.2 To initiate this process, please contact us via live chat in our Community with your request. We will confirm receipt of your request and proceed to return and/or delete your personal data as specified. Note that we may need to verify your identity before processing your request to ensure the security of your personal data.

13. Retention of Personal Data About You

13.1 We shall retain Personal Data about you for as long as necessary to fulfill the purposes outlined in this Policy, or for a longer period as required by applicable legislation, regulation, policies, and orders.

13.2 To ensure that Personal Data about you is not retained longer than required, we periodically review the Personal Data we hold to determine whether it can be erased. Our retention periods are based on:

- The necessity of the data for the provision of our Services.
- Legal obligations for retaining specific types of data.
- The need to resolve disputes, enforce our agreements, and protect our legal rights.

14. Changes to Our Policy

14.1 We may update this Policy periodically. When we do, we will revise the "Last updated" date at the top of this page. We encourage you to review this page regularly to stay informed about our information practices and any changes to our Privacy Policy.

14.2 Your continued use of the Site following the posting of changes to this Policy signifies your acceptance of those changes. If you do not agree with the revised Policy, please discontinue use of our Site and Services.

14.3 For significant changes, we may provide additional notice via email or a prominent notice on our Site before the changes take effect.

14.4 We recommend that you check this page periodically for any updates. Changes to this Policy are effective when posted on this page.

15. Contact Us

If you wish to file a contact or have questions about our services, policies, and terms of use, you can reach out to our customer support through Live Chat in our Community.