

# PRIVACY POLICY

Volo is an app service and Liquid Staking Protocol accessible via a mobile device application and a browser service for the Sui Network (the "Network") distributed by Volo. ("VOLO WALLET LLC" or "we" or "us" or "our") that enables users to (i) self-custody digital assets; (ii) access a digital asset browser and link to decentralized applications and decentralized exchanges; (iii) view addresses and information that are part of digital asset networks and broadcast transactions; and (iv) additional functionality as VOLO WALLET LLC may add to the app from time to time (collectively, the "App" "Volo" or "Volo Wallet"). This Privacy Policy ("Privacy Policy") helps explain how we collect, use, store, and protect your information when you use the App, our developer software, or our website at <https://volo.fi> (collectively the "Services").

Please also read Volo Terms of Service (the "Terms"), which describe the terms under which you use the Services.

## I. INFORMATION WE COLLECT

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We receive or collect information when we operate and provide our Services, including when you install, access, or use our Services.

Information you provide when installing or using our services:

- Your Account Information - To create a Volo account, you will be required to connect with a social media account, we may collect emails, profile information, account settings, accounts you follow, mute or block.
- Your Transactions - Your Network private key, which you utilize to access your funds and initiate transactions, is stored only on your own device. However, to facilitate your transactions and provide you with your account balance, we store the Network public key address associated with your Network private key.
- Customer Support - We may collect additional information you may disclose to our customer support team.

Automatically collected information.

- Metrics and Performance Data - We may collect service-related, diagnostic, and performance information. This includes high level information about your activity (such as how you use our Services and how you interact with others using our Services), and diagnostic, crash, website, and performance logs and reports.
- Device and Connection Information - We may collect device-specific information when you install, access, or use our Services. If you choose to allow push notifications through Volo Wallet, your device's unique push token. We also temporarily collect information about decentralized applications (dApps) that you are connecting to, for you to view the application history from another device.
- Status Information - We may collect information about your online status on our Services, such as when you last used our Services (your "last seen status").

We collect your personal data directly from you or from other parties whom you have authorized such collection. We do not process special categories of personal data about you unless you voluntarily provide such data to us.

If you would like to learn more about the definitions used throughout this document such as the "legal grounds", "legitimate interests" or " , please visit the Information Commissioner's Office's [website](#).

## II. HOW WE USE THE INFORMATION WE COLLECT

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Our primary purpose in collecting information is to help us operate, provide, improve, customize, support, and market our Services. We may use your information to:

- To provide, maintain, debug, improve, and enhance our Services.
- To understand and analyze how you use our Services and develop new products, services, features, and functionality.
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, provide you with our newsletter, respond to comments and questions, and otherwise provide customer support.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.
- To personalize your experience on our Services such as identifying you as a repeat visitor
- To facilitate the connection of third-party services or applications
- To facilitate transactions such as an exchange
- To create de-identified and/or aggregated data to improve for our business purposes, including to improve our Services.
- To find and prevent fraud, detect security incidents, and respond to trust and safety issues that may arise.
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- For short-term, transient use.
- To contract with service providers to perform services on our behalf, including providing customer service, processing job applications, verifying customer information, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- For other purposes for which we provide specific notice at the time the Personal Information is collected
- We will not use your information for purposes other than those purposes we have disclosed to you, without your permission.

## III. HOW YOUR INFORMATION IS SHARED WITH OTHER VOLO USERS

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If you use your account to engage in a transaction with another user, that user will have access to your transaction information. Users with whom you interact with may store or re-share your information with others, on or off our Services. We, however, will never store your transaction information.

## IV. MARKETING

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We will never sell or rent your information to third parties. Any communications we send to you will either be related to your account or will be related to the Services. Occasionally, you may see offers or advertisements from our trusted partners. These are intended to enhance your user experience and provide value and are not a result of selling or renting your information. In the event we send any communication to you which is not related specifically to your account, we will provide you with an 'unsubscribe' mechanism through which you may opt out of receiving other similar messages in the future.

## V. HOW WE SHARE INFORMATION WITH THIRD PARTIES

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We work with third-party providers to help us operate, provide, improve, customize, support, and market our Services. For example, we work with companies to distribute our apps, provide our infrastructure, delivery, and other systems. These providers may provide us with information about you in certain circumstances; for example, app stores may provide us reports to help us diagnose and fix service issues.

We may also share information with law enforcement, government officials, or other third parties when:

- We are compelled to do so by a subpoena, court order, or similar legal procedure; or
- We believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our Terms.

Finally, we may share information with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policy.

## VI. HOW WE USE COOKIES

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When you access our Services, we may place small data files called cookies or pixel tags on your computer or mobile device.

We use these files to understand, secure, operate, and provide our Services. For example, we use cookies to:

- Provide all web-based Services, improve your experience, and understand how our Services are being used.
- Measure the effectiveness of our promotions; and
- Remember your choices and customize our Services for you.

You can also disable/delete the cookies set by our website - please find the appropriate instructions by following these links on how to implement the deletion in different browsers, please note that if you set your browser or device to disable cookies, certain of our Services may not function properly.

- For Google Chrome browser, please refer to this [link](#)
- For Firefox browser, please look up [here](#)
- For Safari browser, please visit [here](#)
- For Internet Explorer browser, please refer to [this](#)

## VII. PERSONAL DATA OF CHILDREN

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If you are a resident of the US and you are under the age of 13, please do not submit any personal data through the website. If you have reason to believe that a child under the age of 13 has provided personal data to us through the Services, please contact us, and we will endeavor to delete that information from our databases.

If you are a resident of the European Economic Area and you are under the age of 16, please do not submit any personal data through the Services and the website. We do not collect or process Personal Information pertaining to a child, where a child under the GDPR is defined as an individual below the age of 16 years old.

## VIII. HOW YOU CAN ACCESS OR CHANGE YOUR INFORMATION

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If you would like to manage, limit, or delete your information, you may do so by logging into Volo Wallet app and tapping the Settings icon.

You may delete your Volo account at any time. Please remember that when you delete your account, it does not affect the information other users have relating to you. Please also note that Volo does not ever store your Network private key, so if you delete the application, make sure you have a copy of your private key elsewhere so that you may continue to access your Network funds. We do provide a feature within the App that will display your locally stored private key stored to you in readable form so that you may write it down and keep a copy of the key off your device.

## IX. OUR GLOBAL OPERATIONS

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You agree to our information practices, including the collection, use, processing, and sharing of your information as described in this Privacy Policy, as well as the transfer and processing of your information to the United States and other countries globally where we have or use facilities, service providers, or partners, regardless of where you use our Services.

You acknowledge that the laws, regulations, and standards of the country in which your information is stored or processed may be different from those of your own country. However, we require our service providers to treat your information in strict confidence and use appropriate security measures to protect it. We also require them to uphold all obligations under this Privacy Policy.

## X. DO NOT TRACK

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There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

## XI. UPDATES TO OUR POLICY

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We may amend or update our Privacy Policy from time to time and give you the opportunity to review the updated Privacy Policy before choosing to continue to use Volo. We will notify you of material changes to this policy by updating the last updated date at the top of this page, and we will provide you with explicit notice of material changes as required by law.

## CONTACT US

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In order to resolve a complaint regarding the Services or to receive further information regarding use of the Services, please contact us at:

VOLO WALLET LLC

[support@volo.fi](mailto:support@volo.fi)