

Magic Newton Operations Ltd.

Privacy Policy

Effective Date: May 29, 2025

1. Introduction

Magic Newton Operations Ltd. ("Platform Operator," "we," "us," or "our") is committed to respecting and protecting your privacy. This Privacy Policy describes how we collect, use, disclose, retain, and safeguard personal information in connection with your use of our Services.

By using the Services, you acknowledge that you have read, understood, and agree to this Privacy Policy and our Terms of Use (which can be accessed at our website newt.foundation). If you do not agree, please do not use our Services. Any terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms of Use.

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your data or your choices and rights regarding such collection and use, please do not hesitate to contact us at privacy@newt.foundation.

2. Scope of this Privacy Policy

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below. This includes:

- Personal information collected when you visit, use, or interact with our Services.
- Public blockchain data, including wallet addresses and transactions recorded on the Protocol.
- Third-Party services and integrations, including external providers used to support our Services.

This Privacy Policy does not apply to third-party websites, services, or blockchain applications that we do not control. We encourage you to review the privacy policies of third parties before interacting with them.

3. Information We Collect

We collect information from you in the following ways:

3.1. Information You Provide Directly

- **Account Information.** We may collect personal information in connection with the creation or administration of your account, such as your name, IP address, email address, social login information, and digital wallet address.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about the Services, register for our newsletter, request support, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

This may include:

- Identity and Contact Information (e.g., name, IP address, email address, username).
- Wallet Address (e.g., data linked to transactions on a blockchain).
- Profile Information (e.g., bio, social media handles, avatars).
- User-Generated Content (e.g., forum posts, comments, reviews).
- Communication Preferences (e.g., marketing opt-in/opt-out settings).

3.2. Information Collected Automatically

We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect information through your use of our Services.

We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, items that you search for via the Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.

3.3. Public Blockchain Data

Since the Protocol operates using a decentralized blockchain, transactions you perform using our Services are recorded on a public ledger and may include:

- Wallet addresses (sender and recipient).
- Transaction details (amounts, timestamps, smart contract interactions).
- On-Chain Activity (e.g., staking, governance participation, DeFi interactions).

Because blockchain transactions are immutable and public, we cannot delete or alter such records.

3.4. Information from Third Parties

We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, we may collect personal information about you from that third-party application that you have made available via your privacy settings. We may obtain information about you from:

- Third-Party Identity Verification Services (for fraud prevention and compliance).

- Social Media Platforms (if you engage with us on external sites).
- Community Partners (e.g., for event participation, promotions, or referrals).
- Marketing and Analytics Providers (e.g., Google Analytics, advertising networks).

4. How We Use Your Information

We use your personal information for the following purposes:

4.1. Providing and Managing Services

- Managing your information and accounts.
- Providing you with the Services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Answering requests for customer or technical support.
- Communicating with you about your account, activities on our Services, and policy changes.
- Processing applications if you apply for a job we post on our Services.
- Allowing you to register for events.
- Processing transactions and verifying blockchain interactions.
- This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality.

4.2. Administrative, Security, Compliance, and Fraud Prevention

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
- Measuring interest and engagement in our Services.

- Improving, upgrading, or enhancing our Services, including testing, research, internal analytics, and product development.
- Developing new products and services.
- Ensuring internal quality control and safety.
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy.
- Debugging to identify and repair errors with our Services.
- Auditing relating to interactions, transactions, and other compliance activities.
- Sharing personal information with third parties as needed to provide the Services.
- Enforcing our agreements and policies.
- Carrying out activities that are required to comply with our legal obligations.

4.3. Improving and Customizing Services

- Personalizing user experiences based on behavior and preferences.
- Conducting research, analytics, and performance optimization.
- We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services.
- We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed.

4.4. Communications and Marketing

- Sending service-related notifications and updates.
- Conducting promotional campaigns, events, and community outreach.
- We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law. Some of the ways we may market to you include email campaigns and through social media channels, such as Telegram or Discord. If you have any questions about our marketing practices, you may contact us at any time as set forth in “Contact Us” below. You may opt out of marketing communications at any time.

4.5. With Your Consent; By Law

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent. We also use your personal information for other purposes as requested by you or as permitted by applicable law.

4.6. De-identified and Aggregated Information

We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about how you use the Services, information about the device from which you access our Services, or other analyses we create. De-identified and/or aggregated information is not personal information, and we may use, disclose, and retain such information as permitted by applicable laws including, but not limited to, for research, analysis, analytics, and any other legally permissible purposes.

5. How We Share Your Information

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

5.1. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, analytics and digital advertising, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We

may also share your personal information with business partners with whom we jointly offer products or services.

- **Affiliates.** We may share your personal information with our ecosystem partners or any of our parent companies, Affiliates, subsidiaries, or other related companies.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising”, “personalized advertising”, or “targeted advertising.”

5.2. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

5.3. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

6. International Transfers

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your personal information consistent with the requirements of applicable laws.

If your personal information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your personal information violates applicable law.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner's Office \(ICO\)](#)

7. Data Retention

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws. To determine the appropriate retention period for personal information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means. **Public blockchain data is indefinitely recorded on decentralized networks.**

8. Cookies and Tracking Technologies

Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.

A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

We use cookies, web beacons, and other Technologies for several reasons, including but not limited to:

- Authenticate users and prevent fraud.
- Store preferences and improve usability.
- Analyze performance and engagement.

You can disable cookies through browser settings, but this may affect functionality.

9. Data Security

We implement industry-standard security measures, including:

- Encryption of sensitive data.
- Access controls and authentication safeguards.
- Regular security audits and vulnerability testing.

However, no system is 100% secure, and we cannot guarantee absolute protection of your data.

10. Your Rights and Choices

Depending on your jurisdiction, you may have the right to:

- Access and obtain a copy of your personal data.
- Request deletion of personal information (excluding blockchain data).
- Withdraw consent for marketing communications.
- Restrict processing of your data in certain circumstances.

To exercise your rights, contact us at privacy@newt.foundation.

11. Third-Party Services and Links

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

12. Children's Privacy

The Services are not directed to children under 18 (or other age as required by local law), and we do not knowingly collect personal information from children. If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in “Contact Us” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account, if applicable.

13. Changes to this Privacy Policy

We may revise this Privacy Policy from time to time at our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

14. Contact Us

For any privacy-related inquiries, including any inquiries to access, review, delete and make changes to the information you submitted, please contact us at:

Magic Newton Operations Ltd.

privacy@newt.foundation

Jayla Place, 2nd Floor, Road Town, Tortola, VG1110, British Virgin Islands