

Privacy Notice for Vision Wallet

Effective Date: April 2026

This Privacy Notice is issued by and on behalf of VW3 Labs Ltd, a company incorporated in the Cayman Islands with its business address at CO Services Cayman Limited, PO Box 10008, Pavilion East, Cricket Square, Grand Cayman KY1-1001, Cayman Islands (the "Company", "we", "us", "our"). It explains how we collect, use, disclose and protect Personal Data in connection with the operation of the non-custodial Web3 wallet interface and related website (the "**Wallet**" and "**Services**").

By accessing or using the Services, you acknowledge the processing of Personal Data in accordance with this Privacy Notice. If you do not agree, please do not use the Services.

CHANGES TO THIS Notice

We may update this Notice from time to time to reflect changes in our data practices, legal obligations or the Services. Material changes will be prominently highlighted on our website prior to taking effect, and the revised Effective Date will be updated accordingly. Your continued use of our website or continued interaction with us after an update constitutes notice of the new Privacy Notice versions.

DEFINITIONS

For the purposes of this Privacy Notice, the following terms have the following meanings:

- "**Appropriate Safeguards**" means such legally enforceable mechanism(s) for transfers of Personal Data as may be permitted under Data Protection Laws from time to time.
- "**Data Controller**" has the meaning given in applicable Data Protection Laws from time to time.
- "**Data Protection Laws**" means, as binding on either party:
 - means the Cayman Islands Data Protection Act (2021 Revision), together with any regulations made under it and any replacement or amending legislation;
 - to the extent applicable, EU GDPR;
 - any binding decision of the courts and tribunals of the Cayman Islands that relate to the application or interpretation of any of the foregoing;
 - any other Data Protection Laws as may be applicable to you.

- **"Data Subject"** has the meaning given in applicable Data Protection Laws from time to time.
- **"EU GDPR"** means Regulation (EU) 2016/679 of the European Parliament and of the Council.
- **"Personal Data"** has the meaning given in applicable Data Protection Laws from time to time.
- **"Processing"** (or to **"Process"**) means, in relation to Personal Data, collecting, recording, holding or storing the Personal Data or carrying out any operation or set of operations on the Personal Data, including the (a) organisation, adaptation or alteration of Personal Data; (b) retrieval, consultation or use of Personal Data; (c) disclosure of Personal Data by transmission, transfer, dissemination or otherwise making available; or (d) alignment, combination, correction, erasure or destruction of Personal Data.

RELATIONSHIP TO THE BITPANDA GROUP PRIVACY NOTICE

This Privacy Notice applies specifically to the Wallet and its landing page.

Certain other Bitpanda-affiliated entities maintain their own privacy notices addressing their separate products and services. Information about those privacy practices (including general data governance and security standards) is available in the Bitpanda Group Privacy Notice at:

<https://www.bitpanda.com/en/legal/bitpanda-group-privacy-notice>

For the avoidance of doubt, VW3 Labs Ltd acts as an Independent Data Controller in respect of Personal Data processed through the Wallet and is responsible for compliance with Data Protection Laws in connection with such processing.

WHAT PERSONAL DATA WE COLLECT

We collect Personal Data only to the extent necessary to operate and support the Wallet. We do not collect, store or have access to private keys, seed phrases, signing credentials or recovery material.

A. Information You Provide to Us Directly

We collect Personal Data you voluntarily provide, for example when you contact us or request information. This may include:

- name and email address;
- your Wallet address and your publicly accessible blockchain activity data; and
- the content of communications you send to us.

We do not collect, use, store, or otherwise process Special Categories of Personal Data (as defined under applicable data protection legislation). Data subjects are expressly requested to refrain from submitting or disclosing any such data to the Company. Any Special Categories of Personal Data transmitted to the Company inadvertently shall not be processed, and the Company accepts no liability arising from the submission of such data in contravention of this notice.

B. Personal Data Collected Automatically

When you access the Wallet or landing page, we may automatically collect limited technical information (Usage Data) such as:

- IP address and approximate location;
- device type, browser and operating system;
- access timestamps and interaction logs; and
- basic performance or diagnostic data (e.g. crash logs, where enabled).

C. Personal Data from Other Sources

In limited circumstances, we may receive Personal Data from service providers supporting infrastructure, analytics, security or compliance, or from public sources (including public blockchains).

HOW WE USE PERSONAL DATA

We process Personal Data solely for the following purposes:

- operating and maintaining the Wallet and landing page;
- enabling security features and protecting against fraud, misuse or unauthorised access;
- responding to enquiries and providing user support;
- complying with applicable laws and lawful requests; and
- improving the performance, reliability and security of the Services.

We do not engage in behavioural marketing or targeted advertising in connection with the Wallet.

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

We process Personal Data where permitted under the Data Protection Laws, including where processing is:

- based on your consent;

- necessary for the performance of a contract or steps taken at your request;
- necessary to comply with legal obligations; or
- necessary for our legitimate interests in operating, securing and improving the Wallet, provided those interests are not overridden by your rights.

The processing of your Personal Data may be permissible under more than one of the above legal bases simultaneously.

HOW WE SHARE PERSONAL DATA

We disclose Personal Data only where necessary and proportionate, and only to the following categories of recipients:

- service providers and affiliated entities supporting hosting, security, analytics and website functionality;
- professional advisers (e.g. legal and accounting);
- regulators or authorities where required by law; and
- third-party wallets, protocols or decentralised applications you choose to interact with (acting as independent Data Controllers).

We do not sell Personal Data and we do not share Personal Data for targeted advertising.

THIRD-PARTY WALLETS, DAPPS AND PROTOCOLS

The Wallet may enable interaction with third-party wallets, blockchain protocols or decentralised applications operated independently of us. Any Personal Data processed by those third parties is governed by their own privacy policies and practices. We are not responsible for their processing activities and encourage you to review their notices before interacting with them.

INTERNATIONAL DATA TRANSFERS

Personal Data may be processed outside the Cayman Islands where necessary (for example, by service providers). Where this occurs, we implement appropriate safeguards to ensure a level of protection consistent with the Data Protection Act.

Where such transfers occur, we implement Appropriate Safeguards to ensure a standard of protection consistent with the requirements of the DPA, which may include:

- Standard Contractual Clauses (SCCs) approved by the relevant supervisory authority;
- Adequacy decisions or equivalent mechanisms recognised under applicable law; or
- Other legally recognised transfer mechanisms as appropriate to the circumstances.

For more information about the safeguards we use, please contact us using the contact option below.

RETENTION

We retain Personal Data only for as long as reasonably necessary to fulfil the purposes described in this Privacy Notice, comply with legal obligations, resolve disputes and enforce our rights. Retention periods are reviewed regularly.

To determine the appropriate retention period for Personal Data, we may consider applicable legal requirements, the amount, nature, and sensitivity of the Personal Data, certain risk factors, the purposes for which we process Personal Data, and whether we can achieve those purposes through other means.

SECURITY

We implement reasonable technical and organisational measures designed to protect Personal Data against unauthorised access, loss or misuse. If we become aware of a data incident likely to pose a material risk to your rights and freedoms, we will notify you and/or the Cayman Islands Ombudsman as required by applicable Data Protection Laws.

PERSONAL DATA OF CHILDREN

The Services are directed exclusively at individuals aged 18 years or older. We do not knowingly collect or process Personal Data from individuals under the age of 18.

Access to the Services requires users to confirm they are aged 18 or over at the point of onboarding. If we become aware that Personal Data has been collected from a person under the age of 18 without appropriate consent, we will take prompt steps to delete such data.

COOKIES AND OTHER TRACKING TECHNOLOGIES

We use essential cookies to operate our website. If we enable analytics cookies, we will present a cookie banner that explains the categories used and allows you to control your preferences. You can also manage cookies through your browser settings (blocking some cookies may affect site functionality).

We do not use behavioural advertising cookies and our site is not designed to respond to “Do Not Track” signals.

YOUR RIGHTS

Subject to applicable Data Protection Laws, you may have the following rights in respect of your Personal Data:

- the right to access your Personal Data and receive a copy of it;
- the right to correct inaccurate or incomplete Personal Data;
- the right to request erasure of your Personal Data in certain circumstances;

- the right to object to or restrict certain types of processing; and
- the right to lodge a complaint with the Cayman Islands Ombudsman.

EU Residents: Additional Rights

If you are located in the European Union or United Kingdom, you may have additional rights under EU GDPR respectively, including:

- the right to data portability;
- the right to withdraw consent at any time (where processing is based on consent), without affecting the lawfulness of processing carried out prior to withdrawal;
- the right not to be subject to solely automated decision-making, including profiling, that produces legal or similarly significant effects; and
- the right to lodge a complaint with your local supervisory authority (the relevant EU Data Protection Authority in your Member State).

To exercise any of your rights, please contact us using the link Contact Us section below. We may need to verify your identity before processing your request. We will respond within the timeframes required by applicable law

EU Representative

As VW3 Labs Ltd is established in the Cayman Islands but offers services to individuals in the European Union and the United Kingdom, we have appointed a representative in the EU for the purposes of Article 27 of EU GDPR.

Our designated EU representative is: Bitpanda GmbH, with its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, registered in the commercial register of the Commercial Court of Vienna under FN 569240 v. Contact: legal@bitpanda.com.

You may contact our representative directly in relation to any matter concerning our processing of your Personal Data via the contact form below. Our representative will escalate to us and coordinate our response.

CONTACT US

VW3 Labs Ltd is the Data Controller for Personal Data processed in connection with the Wallet.

For any questions about this Privacy Notice, to exercise your data protection rights, or to raise a concern about our data practices, please contact the Data Protection Officer via: [Contact the DPO](#).

You also have the right to lodge a complaint directly with the Cayman Islands Ombudsman (as the supervisory authority under the DPA), or, if you are located in the EU or UK, with the relevant supervisory authority in your jurisdiction.