

MEXAS WALLET – PRIVACY POLICY

Effective date: 21 May 2025

Thank you for using Mexas Wallet (the “**App**”) developed and operated by **Sixtant Incorporated** (“**Sixtant**,” “**we**,” “**us**,” or “**our**”). Protecting your privacy is important to us. This Privacy Policy explains how we collect, use, disclose, and safeguard information when you install or use the App or interact with any related services (collectively, the “**Services**”).

If you have any questions or concerns, please contact us at legal@mexaswallet.com.

1. Who We Are (Data Controller)

Sixtant Incorporated is a business company incorporated in the British Virgin Islands. For the purposes of applicable data-protection laws—including the EU General Data Protection Regulation (GDPR) and comparable laws in other jurisdictions—Sixtant is the **data controller** of the personal information collected via the Services.

2. Scope of This Policy

This Policy applies to personal information we collect through:

- The Mexas Wallet mobile application (iOS, Android, or other versions we release);
- In-app analytics and diagnostics;
- Your direct communications with us (e.g., email support requests);
- Our official social-media channels or community forums when we direct you to this Policy.

It **does not** apply to information collected by third-party websites, decentralized applications (dApps), or blockchain networks you choose to access through the App. Those third parties govern their own privacy practices.

3. Information We (Minimally) Collect

The App is designed as a **non-custodial wallet**: we do **not** collect or have access to your private keys, recovery phrases, or on-chain transaction contents. We intentionally collect only the minimal data necessary to operate and improve the App.

Category	Examples	Purpose	Legal Basis*
Diagnostics & Usage Data (Automatically)	Device model, OS version, app version, language, timestamp, screens viewed, anonymized crash logs, coarse location (country/region)	App functionality, bug fixing, performance analytics	Legitimate interests (Art. 6(1)(f) GDPR)
Contact Data (You Provide)	Email address, name (if you include it), message content when you email support	Customer support, issue resolution	Consent (Art. 6(1)(a)) or legitimate interests
Push-Notification Tokens (Optional)	Device notification token	Enable opt-in push notifications for updates	Consent
Aggregated Metrics	Aggregated, de-identified statistics (e.g., number of active wallets per version)	Product planning	Legitimate interests

* Where GDPR applies. In other jurisdictions we rely on equivalent lawful bases.

We do **not** intentionally collect:

- Biometric identifiers, government IDs, or precise geolocation;
- Private keys, seed phrases, or raw blockchain transactions;
- Sensitive personal information as defined under GDPR, CCPA/CPRA, or similar regulations.

4. How We Use Your Information

We use the limited information we collect to:

1. Provide, operate, and maintain the App and Services;
2. Diagnose, troubleshoot, and fix bugs or crashes;
3. Understand how the App is used and improve features and user experience;
4. Communicate with you, including responding to inquiries or support requests;
5. Send push or in-app notifications you opt in to receive;
6. Detect, prevent, and address fraud, security, or technical issues;
7. Comply with legal obligations and enforce our Terms of Service.

We do **not** sell or rent your personal information to third parties.

5. Sharing & Disclosure

We share information only in the following limited circumstances:

- **Service Providers.** We use carefully-chosen third-party service providers (e.g., cloud-infrastructure, analytics, crash-reporting) who process data on our behalf and under contractual confidentiality and data-protection obligations. Examples include but are not limited to Google Firebase Crashlytics or Sentry (crash diagnostics) and AWS or similar cloud platforms.
- **Legal & Compliance.** We may disclose information if required by law or in response to valid legal requests (e.g., court orders) or to enforce our rights, protect users, or investigate fraud.
- **Corporate Transactions.** In the event of a merger, acquisition, reorganization, or asset sale, your information may be transferred as part of that transaction subject to the promises in this Policy.
- **With Your Consent.** We may share information with third parties when you expressly direct us to do so.

6. International Data Transfers

Because we and our service providers are located in several countries, your information may be transferred to—and processed in—jurisdictions outside your own that may have different data-protection laws. Where required, we use appropriate safeguards (e.g., Standard Contractual Clauses approved by the European Commission) to protect such transfers.

7. Data Security

We employ reasonable technical and organizational measures to protect information under our control from loss, misuse, and unauthorized access. Measures include encryption in transit (TLS), restricted access, least-privilege principles, and regular security reviews. However, **no** internet-based service can guarantee absolute security, and you use the App at your own risk.

8. Data Retention

We retain personal information only for as long as necessary to fulfill the purposes described in this Policy, unless a longer retention period is required or permitted by law (e.g., tax, accounting, or regulatory purposes). Diagnostic data is typically retained for **no more than 24 months** and aggregated thereafter. Emails or support tickets are retained **up to 5 years** or until deletion is requested, whichever comes first.

9. Your Privacy Rights

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- **Access & Portability** – request a copy of personal data we hold about you;
- **Correction** – request correction of inaccurate or incomplete data;
- **Deletion** – request deletion of your data (“right to be forgotten”);
- **Restriction or Objection** – restrict or object to certain processing;
- **Withdraw Consent** – withdraw consent at any time when processing is based on consent;
- **Lodge a Complaint** – file a complaint with your local data-protection authority.

To exercise any rights, please email legal@mexaswallet.com. We may need to verify your identity before fulfilling a request.

10. Children’s Privacy

The Services are **not directed to children under 16**. We do not knowingly collect personal information from children. If we learn that we have inadvertently collected such data, we will delete it promptly. Parents or guardians who believe we hold information about a child may contact us.

11. Changes to This Privacy Policy

We may update this Policy periodically. We will post the updated version in the App and change the “Effective date” above. We may also notify you via a prominent notice or push notification. Your continued use of the Services after an update signifies acceptance of the changes.

12. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact our privacy team:

Email: legal@mexaswallet.com

Last updated: 21 May 2025