

SIZE: PRIVACY POLICY

Operated by Trench Labs Group Ltd. ("the Company", "we", "us", "our")

Effective Date: 30 June 2026 • Last Updated: 11 August 2026

This Privacy Policy explains how we collect, use, disclose, and protect personal data when you access or use Size (the "Platform"). We apply a high, GDPR-aligned standard of data protection to all users globally. It is designed to meet the EU General Data Protection Regulation and the UK GDPR (together, "GDPR") for users in the European Economic Area ("EEA") and the United Kingdom ("UK"), and the data protection law of the jurisdiction in which the Company is established. It should be read together with our Terms of Service. By using the Platform you acknowledge this Policy. Where required by law, we rely on your consent, which you may withdraw as described below.

For the purposes of the GDPR, the Company is the data controller. Our data protection contact is set out in Section 12. Capitalized terms used but not defined in this Policy have the meaning given in our Terms of Service.

1. PERSONAL DATA WE COLLECT

1.1 Data you provide or generate when you use the Platform.

- **Account and authentication data.** When you create an Account, our embedded wallet and authentication provider (Privy) processes the identifier you sign up with, such as your email address or a linked social or passkey credential, and provisions your non-custodial Wallet. We receive a Wallet address and authentication status. We do not receive, hold, or have access to your private keys.
- **Wallet and on-chain data.** Your Wallet (public) address, on-chain transactions you authorize (such as Store purchases, rewards, and Payouts), and associated token activity. Because public blockchains are open and immutable, this information is publicly visible and cannot be deleted from the blockchain.
- **Platform and game data.** Your activity within Trials, Lives, and the Store, including game results, simulated performance metrics, settings, and preferences.
- **Communications.** If you contact us or our support channels, the content of those communications and any information you include, such as your email address.

1.2 Data we collect automatically.

- **Device and log data.** IP address, date and time of access, browser and operating system type and version, language, device identifiers, referring pages, and API endpoints accessed.
- **Geolocation data.** Approximate location derived from your IP address, which we use to apply our jurisdiction and eligibility restrictions (for example, to block access by persons in Restricted Jurisdictions or in other locations where the Platform is not offered, such as the United States of America and the Province of Ontario, Canada).
- **Usage data and cookies.** Information about how you interact with the Platform, collected through cookies and similar technologies (see Section 5).

1.3 Data we receive from third parties.

- Our embedded wallet and authentication provider (Privy), our product analytics provider, our IP-geolocation and geoblocking provider, and, where used, blockchain analytics and sanctions-screening providers and our hosting and communications providers. These providers supply us with the categories of data described above to enable, secure, and improve the Platform.

We do not intentionally collect special categories of personal data, and you should not provide them to us.

2. HOW AND WHY WE USE PERSONAL DATA, AND OUR LEGAL BASES

We use personal data for the following purposes. For GDPR users, the legal basis is shown in brackets.

- **To provide and operate the Platform**, including creating your Account, provisioning your Wallet, running Trials and Lives, processing Store interactions, and enabling Payouts. (Performance of a contract.)
- **To enforce eligibility and apply jurisdiction restrictions**, including identifying and blocking persons in Restricted Jurisdictions and other persons to whom the Platform is not offered under our Terms of Service, and detecting attempts to circumvent these restrictions. (Legitimate interests in operating lawfully and managing legal risk; compliance with legal obligations.)
- **To maintain security and prevent fraud and abuse**, including detecting Prohibited Conduct, multi-accounting, exploits, and threats to the integrity of the Platform, and, where we choose to apply them, conducting sanctions or restricted-party checks. (Legitimate interests; compliance with legal obligations.)
- **To communicate with you**, including responding to support requests and sending service-related notices. (Performance of a contract; legitimate interests.)
- **To analyze, improve, and develop the Platform**, including understanding usage and performance. (Legitimate interests; consent where required for non-essential analytics.)
- **To comply with law and enforce our terms**, including responding to lawful requests, and establishing, exercising, or defending legal claims. (Compliance with legal obligations; legitimate interests.)

Where the data protection law of the jurisdiction in which the Company is established requires a specified basis, we process personal data on the basis of your consent, or as necessary to perform our contract with you, to comply with a legal obligation, or as otherwise permitted by that law. Where we rely on your consent, you may withdraw it at any time.

3. DISCLOSURE OF PERSONAL DATA

We do not sell your personal data. We may disclose it to:

- **Service providers (data processors)** who process personal data on our behalf under contract, including our embedded wallet and authentication provider (Privy), product and website analytics providers (including Google Analytics for first-party analytics), IP-geolocation and geoblocking provider, blockchain analytics and sanctions-screening providers, cloud hosting and infrastructure providers, and customer-support and communications providers.
- **Professional advisers**, such as lawyers, auditors, and accountants, where necessary.

- **Authorities and other parties** where we believe disclosure is required or permitted by law, to comply with legal process, to enforce our Terms, or to protect the rights, safety, or property of the Company, our users, or others.
- **Acquirers or successors** in connection with a merger, acquisition, financing, reorganization, or sale of assets.

Public blockchain data (your Wallet address and on-chain transactions) is inherently public and is accessible to anyone, independent of any disclosure by us.

4. INTERNATIONAL TRANSFERS

We operate internationally, and your personal data may be transferred to, stored in, or processed in countries other than the one in which you are located, including outside the EEA and the UK. Where we transfer personal data across borders, we take steps required by applicable law to ensure a comparable standard of protection, including, for GDPR transfers, the use of the European Commission's Standard Contractual Clauses or the UK International Data Transfer Agreement or Addendum, or reliance on an adequacy decision. Where required by the data protection law of the jurisdiction in which the Company is established, cross-border transfers are made with your consent or subject to appropriate safeguards.

5. COOKIES AND SIMILAR TECHNOLOGIES

We use strictly necessary cookies to operate and secure the Platform and to enforce our Terms, and, where you consent, analytics cookies (such as Google Analytics) to understand and improve usage. In the EEA and UK, we place non-essential cookies only with your prior consent, which you can give or withdraw at any time through our cookie banner. You can also manage cookies through your browser settings. Disabling strictly necessary cookies may prevent the Platform from functioning. Full details of the cookies we use are set out in our separate Cookie Policy.

6. DATA RETENTION

We retain personal data only for as long as necessary for the purposes set out in this Policy, including to provide the Platform, to comply with legal, accounting, security, and reporting obligations, and to establish, exercise, or defend legal claims. Retention periods depend on the nature of the data and the purpose of processing. On-chain data cannot be deleted from public blockchains.

7. YOUR RIGHTS

7.1 General rights. Subject to applicable law, you may request access to, and correction of, the personal data we hold about you, and you may withdraw any consent you have given (subject to legal or contractual restrictions and reasonable notice). We will respond to access requests within the period required by applicable law and, in any event, without undue delay.

7.2 Under the GDPR (for EEA and UK users), you may, subject to conditions and exemptions, request access to, rectification, or erasure of your personal data; restrict or object to processing; request data portability; and

withdraw consent at any time without affecting prior processing. You also have the right to lodge a complaint with a supervisory authority.

7.3 Limits. These rights apply only in certain circumstances and may be limited by law. Some data, such as on-chain transactions on a public blockchain, cannot be altered or deleted. We may need to verify your identity before acting on a request, and we may decline requests where permitted by law.

To exercise any right, contact us using the details in Section 12.

8. SECURITY

We implement reasonable technical and organizational measures designed to protect personal data against unauthorized access, use, alteration, loss, or disclosure. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security. You are responsible for safeguarding your authentication credentials, Wallet, and recovery method; we cannot access or recover your private keys.

9. CHILDREN'S DATA

The Platform is not directed to and may not be used by anyone under 18 (or the higher age of majority in their jurisdiction). We do not knowingly collect personal data from such persons. If we become aware that we have collected such data, we will take reasonable steps to delete it.

10. THIRD-PARTY WALLETS, SERVICES, AND LINKS

The Platform relies on, and may link to, third-party services, blockchain networks, and wallet technology operated by independent parties under their own terms and privacy policies. We do not control and are not responsible for the privacy practices of those third parties. You should review their policies before using them.

11. CHANGES TO THIS POLICY

We may update this Policy from time to time. Material changes will be notified by updating the "Last Updated" date and, where appropriate, through the Platform. Changes apply to personal data processed after the effective date of the change.

12. CONTACT US

For questions, requests, or complaints about this Policy or your personal data, or to exercise any of your rights, please submit a request through the support or contact form on the Platform and include your email address so that we can respond. We may need to verify your identity before responding.

EEA and UK users may also lodge a complaint with their local data protection authority. Users elsewhere may contact the data protection authority in their own jurisdiction or in the jurisdiction in which the Company is established.

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