

A&C Tech Privacy Policy

Effective Date: March 22, 2024

This Privacy Policy describes the types of information collected by A&C Tech, Inc (“A&C”, “we”, “us”, or “our”) when you, your employees, agents, and contractors, and any other entity on whose behalf you are interacting with us. This Privacy Policy applies to Your use of our website, mobile application, Digital Assets, the Wallet, or other internet services under the control of A&C, whether partial or otherwise, and related features, content, products, and services (collectively, “Services”).

By accessing the Services or otherwise interacting with A&C, you agree to the terms of this Privacy Policy. If you do not agree to the policy, please do not use the Services.

We may modify this Privacy Policy at any time and will post the current version on the Services. We encourage you to periodically review our Privacy Policy to stay informed about how we are using the information we collect.

Information That You Give Us

We explain here what categories of personal information we have collected, where we got it from, and with whom we have shared it:

Category of Personal Information Collected	Source	Purpose for Collection	Categories of Recipients
Facial Scan Please see "Biometric Privacy and Retention," below, for more information.	From You	For account registration/login/recovery, key pair generation and token generation.	Our service providers.
BioPass	From You	User registration date and joining sequence.	Our service providers.
Username	From You	Used to identify You in connection with the Services.	Our service providers.
Email and Social Media Accounts and Related Info	From you	At your option, for marketing activities.	Our service providers; third-party social media platforms.

Information We Collect Automatically

When you visit the Services, we may collect certain information from you, including your coarse Internet Protocol (IP) address. In addition, we may collect information about your browsing behavior, such as the date and time you visit the Services, the areas or pages of the Services that you visit, the amount of time you spend viewing the Services, the number of times you return to the Services and other clickstream data. We may also use non-personal or aggregated information for statistical analysis, research, and other purposes.

Use of Information

We may use the information we collect from and about you for any of the following purposes: (1) to fulfill your requests for products; (2) to respond to your inquiries; (4) to review Service usage and

operations; (5) to address problems with the Services, our business or our services; (6) to protect the security or integrity of the Services and our business; (7) to monitor the Services for compliance with our Terms of Services, Copyright Policy and the law; (8) to contact you with Services updates, newsletters and other informational and promotional materials from us and third party marketing offers from our trusted partners, as well as from other companies; and (9) to provide advertising.

If you sign up for our mailing list, we will send you informational emails about offers of services. At any time, you can ‘unsubscribe’ yourself from our email list simply by clicking the ‘unsubscribe’ button.

If you do not wish to receive communications from us about special offers and promotions, you can opt-out of receiving these communications by following the instructions contained in the messages you receive. Even if you opt-out of receiving these messages, we reserve the right to send you certain communications relating to the services we provide, and we may send you service announcements and administrative messages. We do not offer you the opportunity to opt-out of receiving those communications. For more information about interest-based advertising, including how you can manage advertising, please see below “Interest-Based Advertising.”

Disclosure of Information

We may disclose information collected from and about you as follows: (1) to our related companies and service providers, to perform a business, professional or technical support function for us; (2) to merchants and/or marketing partners, advertisers or other third parties; (3) as necessary if we believe that there has been a violation of the Site Terms of Services, Copyright Policy, or of our rights or the rights of any third party; (4) to respond to legal process (such as a search warrant, subpoena or court order) and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and (5) in the event that our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets.

Your Privacy Rights—Access, Correction, Deletion & Restrict Processing

We respect your right to access and correct your personal information. You may access your personal information by signing into your account. From there, you can correct or modify your information. You may also exercise your rights, subject to applicable laws, to request that we delete or restrict processing of your personal data. We may need to retain it for legally permitted purposes and this will be explained to you if necessary.

If you need assistance correcting or updating your personal information, or would like to request that we delete or restrict processing of your personal information, please contact us using the contact information detailed in the “Contact Us” section below.

Retention of Personal Information

Personal information that we collect, access or process will be retained only as long as necessary for the fulfilment of the purposes for which it was collected, unless otherwise provided in agreements between you and A&C or as required or authorized by law. Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased, or made de-identified.

Security

We maintain reasonable and appropriate measures designed to maintain information we collect in a secure manner. We have taken certain physical, electronic, and administrative steps to safeguard and secure the information we collect from visitors to the Services. Even though we follow reasonable procedures to try to protect the information in our possession, no security system is perfect, and we cannot promise, and you should not expect, that your information will be secure in all circumstances.

Children

The Services are not directed to children, nor do we knowingly collect any personal information from children under the age of thirteen without verifiable parental consent. If you believe that a child has provided personal information to us, please contact us promptly as described below, and we will endeavor to investigate and delete such information from our systems.

Third Party Services

The Services may contain links to third-party services, such as social media services like Facebook and Twitter, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these web services. Accordingly, we recommend that you review the privacy policy posted on any external site before disclosing any personal information. Please contact those web services directly if you have any questions about their privacy policies.

Changes to This Privacy Policy

We may change this privacy policy from time to time, including as required to keep current with rules and regulations, new technologies and security standards. When we do, we will post the change(s) on our Services. If we change the policy in a material and retroactive manner, we will provide appropriate notice to you.

Visitors from Outside the United States—Cross-Border Transfer

The Services are hosted in the United States. If you are visiting the Services from outside the United States, your information may be transferred to, stored and processed in the United States or other countries in accordance with this Privacy Policy. The data protection and other applicable laws of the United States or other countries may not be as comprehensive as those laws or regulations in your country or may otherwise differ from the data protection or consumer protection laws in your country. Your information may be available to government authorities under lawful orders and law applicable in such jurisdictions. By using the Services and/or providing personal information to us, you consent to transfer of your information to our facilities as described in this Privacy Policy.

Biometric Privacy and Retention

Overview. Your facial recognition data is biometric data under applicable privacy laws, and will be collected only with your express knowledge and consent. The sections below fully describe A&C Tech’s practices regarding the collection, use, storage, and sharing of face data, as required by applicable law and App Store guidelines.

1. What Face Data We Collect

When you register for or use the Services, we capture a mathematical facial feature vector (a “face template”) derived from an image of your face. This face template is biometric data. The original face image is not stored; only the mathematical representation (the template) is retained.

2. Why We Collect and Store Face Data

We collect and store your face template for the following specific purposes:

- Identity verification: To verify your identity at account registration, login, and account recovery.
- Key pair and token generation: To generate and recover the cryptographic key pairs and fungible tokens tied to your account. The tokens are generated from your biometric information, and the biometric data becomes an attribute of those tokens. Without the stored template, you cannot log back in or recover your keys and tokens.

Face data is used solely for these purposes and for no other purpose.

3. How Long We Store Face Data — and Why

Face data is not retained indefinitely. Your face template is stored only for as long as your account remains active. This specific period is necessary because re-verification against the stored template is required each time you access your account and tokens. If the template were deleted while your account is still in use, you would be permanently locked out of your keys and tokens.

Upon account deletion or upon your request to delete your biometric data, the face template is permanently destroyed within 30 days. In all cases, face data is permanently destroyed no later than one (1) year after you stop using the Services.

A&C Tech does not store face data beyond the period necessary to provide the Services. Face data is never stored indefinitely.

4. Third Parties With Whom We Share Face Data

Face data is shared with one third party: Amazon Web Services, Inc. (“AWS”), through the Amazon Rekognition facial recognition service. AWS acts solely as our data processor with respect to your face data. No other third party receives your face data.

5. Why We Share Face Data With AWS

We share face data with AWS because Amazon Rekognition is the service that performs face detection, converts your face image into the mathematical facial feature vector (face template), and performs the face-matching operations required to verify your identity at login and account recovery. Amazon Rekognition is integral to the identity-verification and token-generation functions of the Services.

6. AWS’s Storage and Privacy Practices for Face Data

Yes, AWS stores face data on our behalf. Face templates are stored in an Amazon Rekognition “collection” controlled by A&C Tech’s AWS account, hosted in the United States. The following describes AWS’s privacy practices with respect to your face data:

- Why AWS stores face data: AWS stores the face template solely to provide the Amazon Rekognition service to us—specifically, to perform the face-matching operations required each time you authenticate or recover your account. AWS does not use the face data for any other purpose; it does not use the data to train or improve its own services or models, and it does not share the data with any other third parties.
- How long AWS stores face data: AWS stores the face template for the same period we do—for as long as your account is active and the template remains in our Rekognition collection. When we delete the template from our collection (upon account deletion, upon your deletion request within 30 days, or no later than one year after you stop using the Services), AWS permanently destroys it as well.
- Why AWS stores face data for this length of time: This is the minimum period necessary for AWS to perform the identity-verification function we have contracted it to provide. The template must persist while you are still logging in, because matching cannot occur without a stored reference template. Once the user relationship ends and we delete the template, there is no service-provision basis for AWS to retain the data, so it is permanently destroyed.

AWS’s general privacy practices are described in the AWS Privacy Notice, available at <https://aws.amazon.com/privacy/>. AWS’s data processing practices for Amazon Rekognition are governed by the AWS Data Processing Addendum.

Artificial Intelligence Services (Google Gemini)

AI Section Last Updated: May 8, 2026

A&C uses Google Gemini, a third-party artificial intelligence service provided by Google LLC, to support AI-powered features in the Services. This section supplements the Privacy Policy above and describes the personal information that may be shared with Google Gemini, how that information is collected, how it is used, and the protections that apply.

User permission before sharing. Before the Services send personal information to Google Gemini, we will present an in-app notice that identifies Google Gemini/Google LLC as the recipient, explains the categories of information that will be sent, explains the purpose of the sharing, and asks for your permission. We do not send personal information to Google Gemini unless you affirmatively allow that sharing. If you decline, the related AI-powered feature may not be available.

Information sent to Google Gemini. The information sent to Google Gemini is limited to what is needed for the AI-powered feature you use and may include:

- **AI inputs and content you choose to submit:** prompts, text, messages, instructions, images, documents, files, or other content you provide to an AI-powered feature. We collect this directly from you.
- **AI outputs:** responses, summaries, analyses, or other AI-assisted results generated or returned for your request. These are generated through the operation of the Services and Google Gemini.
- **Account and service identifiers:** username, account identifier, session identifier, request identifier, BioPass or similar service information when needed to associate the AI result with your account or request. We collect this from you or generate it when you use the Services.
- **Device, technical, and request metadata:** coarse IP address, device or browser information, app version, timestamps, usage logs, and related security or request information. We collect this automatically when you use the Services.

Biometric data not sent to Google Gemini. A&C does not send your facial scan, face template, facial recognition data, or other biometric face data to Google Gemini. Face data is collected, used, retained, and shared only as described in the "Biometric Privacy and Retention" section of this Privacy Policy.

Uses of information. A&C and Google Gemini use the information sent to Google Gemini to provide, operate, maintain, secure, troubleshoot, and support the AI-powered feature you request; process, analyze, generate, or return the requested output; prevent fraud, abuse, and security incidents; and document consent and service activity.

Google protections. A&C requires Google to protect personal information sent to Google Gemini using privacy and security protections that are the same as or equal to the protections described in this Privacy Policy, and to process personal information only for the purposes described in this Privacy Policy and our agreements with Google. We do not authorize Google to sell personal information received from A&C or use it for targeted advertising.

Retention, deletion, and revocation. A&C retains personal information as described in the "Retention of Personal Information" section of this Privacy Policy. Google may process and retain information as necessary to provide, secure, monitor, troubleshoot, comply with applicable law, and prevent abuse in accordance with applicable Google terms and our agreements with Google. You may revoke permission for AI-related sharing, or request access, correction, deletion, or restriction of processing, by contacting us as described in the "Contact Us" section of this Privacy Policy.

Except as supplemented by this section, the remaining terms of the Privacy Policy continue to apply.

Contact Us

If you have questions or concerns about this Privacy Policy or how we collect and use the information of our customers, you can contact us by emailing us at info@ac-technology.com, or by postal address at A&C Tech, Inc.; 16450 Scientific Way, #200, Irvine, CA 92618; ATTN: Privacy Request, or by telephone at +1(949) 287-1613.

If we need, or are required, to contact you concerning any event that involves your information, we may do so by email.