

# Stroom

## Privacy Notice

**Last Updated:** July 31, 2025

**Version:** 1.0

### 1. This Privacy Notice

Please carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with your access to and use of the Platform. This Privacy Notice explains which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on. We handle your data in line with this Privacy Notice and strive to comply with applicable data protection laws.

### 2. Interpretation

Unless otherwise provided in this Privacy Notice, capitalised terms used in this Privacy Notice have the meaning determined in the Stroom Terms of Service (the “**Terms**”). You should read the Terms carefully as they affect your obligations and legal rights. In this Privacy Notice, “personal data” and “personal information” are synonyms. They refer to any information that identifies or can reasonably identify you, either directly or indirectly.

### 3. Contact Details

We, Current Limited, a company established under the laws of the Cayman Islands, are the data controller for the data collected under this Privacy Notice, meaning we determine how and why your data is processed. If you have any questions about this Privacy Notice or your data processing, please contact us at: [info@stroom.network](mailto:info@stroom.network).

### 4. Type of Data

The categories of personal data collected depend on how you interact with us, use the Platform, and the requirements of the applicable laws. We collect and process the following types of personal data:

#### a. Wallet Data

This includes Wallet addresses, which are public blockchain addresses associated with your Wallet, and associated transaction data, which may include information about transaction ID, amount, status, time and date, etc. While a Wallet address alone does not identify a specific individual, when combined with other data (such as a name, nickname or email address), it may enable identification. As a result, such combined data could be considered personal information. However, since we do not process any additional information, your Wallet Data is typically not personally identifiable for us.

#### b. Referral Data

This includes your referral code. When you participate in our referral program, we may assign you a unique invitation code, made up of random letters and numbers, to identify you as a user sharing the referral code with others to use the Platform. Invited users also receive their own unique code for internal identification as referred users.

## c. Cookies Data

### i. General

The Cookies Data is collected through Cookies (small files placed on your device (e.g., computer, smartphone, tablet) that help recognise it during interactions with the Platform. Cookies use unique identifiers and, in some cases, may qualify as personal data as they can uniquely identify a device's user without revealing their real identity. There are different types of cookies, including analytical, advertisement, and performance cookies.

### ii. Analytical Cookies Data

This may include Internet protocol (IP) address, browser details, such as type and version, device information, such as type and operating system, information about how you interact with the Platform, like clicks, scrolls, mouse moves, window resize, selections, inputs, session duration, and other usage data regarding the Platform. We can use CLID, \_ga\_\*, \_ga, \_hjSessionUser\_\*, \_hjSession\_\*, \_clck, MR, SM, \_clsk, and other analytical cookies.

### iii. Advertisement Cookies Data

This may include browser and device details, clicks, session duration, and other information about how you interact with the Platform. We can use MUID, ANONCHK, and other advertisement cookies.

### iv. Performance Cookies Data

This may include counts and timestamps of requests, and other information necessary for the Platform functioning. We can use SRM\_B and other performance cookies.

### v. Data Processors

The Cookies Data is collected via third-party solutions, including: (i) Google Analytics, operated by Google Ireland Limited and its affiliates, including Google LLC ("**Google**"), (ii) Microsoft Clarity solution, operated by Microsoft Corporation and its affiliates, including Microsoft Ireland Operations Limited ("**Microsoft**"), and (iii) Hotjar solution, operated by Hotjar Ltd. and its affiliates ("**Hotjar**"). With respect to the Cookies Data, Google, Microsoft, and Hotjar act as our data processors. However, if they use this data for their own purposes, they are independent data controllers, and we are not responsible for their actions. You can learn more about how they process personal data in their privacy policies: [Google's privacy policy](#), [Microsoft's privacy policy](#), and [Hotjar's privacy policy](#).

## d. Platform Usage Data

This may include Internet protocol (IP) address, device details, operating system and browser information, data regarding your interactions with the Platform, and other technical data collected automatically when you connect to the Platform.

## e. Marketing Data

This includes your email address.

#### **f. Contact Data**

This may include name, contact details (such as Telegram and Discord account handles), social media (such as X (Twitter), Telegram channel), and other data, depending on what information you provide to us. Please do not provide personal data unless it is reasonably necessary or requested by us. Note that we may also collect certain other information, which may be required under the applicable laws.

#### **g. Communication Channels Data**

When accessing or participating in our Communication Channels (e.g., X (Twitter), Discord, Telegram, YouTube), you may provide personal data such as nicknames, names, photos, messages, comments, and other shared information. Additionally, the operators of the Communication Channels may automatically generate certain anonymised statistical and analytical data regarding the use of the Communication Channels. Under applicable laws, we may act as a data controller or joint controller of this data. If we are deemed a joint controller, you may exercise your data protection rights with both us and the respective Communication Channel. However, we can only assist with processing operations explicitly covered in this Privacy Notice.

### **5. Data Use**

The personal data is processed as follows:

#### **a. Wallet Data**

We use the Wallet Data (i) to ensure the Platform operation and enable you to use its functionality; (ii) to comply with the applicable laws and regulations; and (iii) to analyse Platform usage and improve its functionality, prevent and detect fraud or abuse, as well as safeguard the security of the Platform and its users.

The lawful basis for such data processing is (i) the performance of a contract with you; (ii) if you act on behalf of an entity, our legitimate interest to ensure the use of the Platform by the entity you represent; (ii) our legal obligation to comply with the applicable laws; and (iii) our legitimate interest in analysing usage, improving functionality, and ensuring the Platform's and its users' security.

#### **b. Referral Data**

We use the Referral Data to enable your participation in our referral program, track invited users, and accrue due Rewards to you, if any.

The lawful basis for such data processing is the performance of a contract with you. If you are an invited user, the lawful basis for your data processing is our legitimate interest to ensure a proper participation in our referral program by the user, who invited you.

#### **c. Cookies Data**

We use the Cookies Data to analyse the Platform usage, understand your needs, and enhance your browsing experience by improving its functionality, usability, user flow, and interface.

The lawful basis for such data processing is your consent. When you first access the Platform, you can choose whether to accept or reject the cookies. Please note that Performance Cookies are necessary for the proper operation of the Platform and ensure functionalities and security features.

#### **d. Platform Usage Data**

We use the Platform Usage Data (i) to operate the Platform, improve its functionality and user interface; (ii) to analyse your interactions with the Platform; (iii) to prevent and detect fraud or abuse; and (iv) to safeguard the security of the Platform and its users.

The lawful basis for data processing under item (i) is the performance of a contract. The lawful basis for other data processing is our legitimate interest to achieve such purposes.

#### **e. Marketing Data**

We use the Marketing Data to provide you with marketing and newsletter emails concerning the latest developments, news, and insights related to the Platform, our products and services.

The lawful basis for such data processing is your consent provided by subscribing to receiving our newsletter.

#### **f. Contact Data**

We use the Contact Data to respond to your inquiry and, where applicable, discuss and perform potential collaboration requests.

The lawful basis for such data processing is our legitimate interest to respond to your inquiry, and, where relevant, taking steps to enter into a contract upon your request or the performance of such a contract.

#### **g. Communication Channels Data**

We use the Communication Channels Data (i) to communicate with visitors, participants, and subscribers; (ii) to handle requests and inquiries received via Communication Channels; and (iii) to gather statistical insights on audience reach and engagement.

The lawful basis for such data processing is our legitimate interest in achieving the stated purposes. If you intend to enter into a contract with us, the processing is also based on the necessity to take steps to enter into a contract upon your request or the performance of such a contract. However, beyond the data processing outlined in this Privacy Notice, we have no control over how Communication Channels handle your personal data in connection with your use of their services.

## **6. Processing Period**

As a general rule, your personal data is kept as long as it is necessary for the purposes it was collected. It may be retained longer if required to meet our legal obligations, in relation to legal proceedings, or to protect our rights and legitimate interests or those of third parties. The storage periods are as follows:

#### **a. Wallet Data**

We do not set a retention period for Wallet Data that is not personal, and we are not able to identify any particular individual with such Wallet Data. If Wallet Data becomes identifiable, it will be retained for six (6) years after the completion of the transaction to which such data relates. Note that due to the nature of a blockchain, the Wallet Data may be stored permanently on the applicable blockchain, not by us, and may be accessed and viewed by any person at any time. For more details, refer to the [‘Your Information and Blockchain’](#) section of this Privacy Notice below.

## **b. Referral Data**

As long as you participate in our referral program and for six (6) years thereafter. We set this retention period due to the statutes of limitations established by the applicable law.

## **c. Cookies Data**

The retention period for Cookies Data varies by cookie type, some cookies persist only for the duration of your active user session, while others remain on your device for up to two (2) years. For details on individual cookies and their retention schedules, please see [Google’s documentation](#), [Microsoft’s documentation](#), and [Hotjar’s documentation](#).

## **d. Platform Usage Data**

Platform Usage Data, such as (IP) address, device details, operating system and browser information, is typically stored during the active user session or shortly after it ends. We do not set a retention period for the Platform Usage Data that does not allow us to identify any individual. If and to the extent we become able to identify any specific individual, we will update this Privacy Notice and set a specific processing period for this Platform Usage Data.

## **e. Marketing Data**

As long as you remain a subscriber. You can unsubscribe from marketing emails at any time by (i) contacting us, or (ii) clicking the unsubscribe button at the bottom of each marketing email. Then your email address will be removed from our marketing database. Please note that administrative or service-related communications (like email verifications or maintenance notifications) are not considered marketing and may not include an unsubscribe option.

## **f. Contact Data**

For six (6) years from the last date when you contacted us regarding the same matter. We set this retention period due to the statutes of limitations established by the applicable law.

## **g. Communication Channels Data**

We do not set retention periods for statistical and analytical data, as it does not allow for the identification of any individual. Any other data is stored as long as they are not deleted by either you or the respective operator of the Communication Channel.

# **7. Data Sharing**

## **a. General**

We do not sell or rent out your data. We may share it in line with this Privacy Notice, applicable laws, the Terms, or with your consent. Appropriate measures will be taken to protect your data during such transfers.

## **b. Recipients**

Given the purposes outlined above, your personal information is shared with the following categories of recipients: (i) Affiliates; (ii) marketing, support, and technical teams; (iii) hosting service providers; (iv) analytical solution providers; (v) government authorities, upon their request or if necessary to comply with our legal obligations; (vi) another entity if we sell or otherwise transfer the Platform or its parts; and (vii) other third-party solutions, which may be from time to time integrated in relation to the Platform. Please note that data that was put into a blockchain will be accessible to any person.

## **8. Your Information and Blockchain**

Please kindly note that the Wallet Data interacts with a decentralised blockchain network: essentially, you enter this data to the blockchain using your Wallet each time you make a blockchain transaction or interact with blockchain smart-contracts. We do not control nor operate blockchain networks. This means that due to the structure of the blockchain network, certain rights or abilities may be limited. It also means that your Wallet Data is publicly available to any person who has access to the blockchain. Please be aware that any transaction within the blockchain network is irreversible and information put into the blockchain cannot be deleted or changed. The ultimate decision whether to transact on a blockchain or carry out any transactions rests with you.

## **9. Automated Decision-Making**

Automated decision-making is the process of making a decision by automated means without any human influence on the outcomes. We do not make any automated decisions based on your personal data. If we intend to process your personal data by any automated means, we will do our best to inform you about the same prior to such processing.

## **10. Data Subject Rights**

### **a. Verification**

In case you wish to exercise your data subject rights, we may request certain information from you to verify your identity and confirm that you are entitled to exercise such rights.

### **b. Blockchain Data Processing**

Please note that when interacting with blockchain networks, you may not be able to fully exercise certain rights under applicable data protection laws regarding your Wallet Data. For example, we may be unable to delete, correct, or restrict your Wallet Data. For more details, refer to '[Your Information and Blockchain](#)' section of this Privacy Notice.

### **c. Data Subject Rights.**

According to the applicable legislation, you may have the following rights:

#### **i. Right to Access**

You can request to see if we process your personal data. If we do, you can ask for details about the processing and a copy of the data to verify its accuracy and legality.

#### ii. Right to Correction

You can request to correct or complete any incomplete or inaccurate data. We may need to verify the accuracy of the new information you provide.

#### iii. Right to Deletion

You can request the deletion of your personal data if we no longer need it, you have successfully objected to processing, we processed it unlawfully, or we must erase it to comply with the law. We may not always be able to fulfil your request due to legal or technical reasons, which will be explained in our response.

#### iv. Right to Objection

You can object to the processing of your data if it does not comply with applicable laws. We may, however, show that we have compelling legitimate grounds for processing that override your rights.

#### v. Right to Restrict Processing

You can ask us to suspend processing your data if: (i) you need to verify its accuracy, (ii) it is used unlawfully, but you do not want it deleted, (iii) you need it to establish, exercise, or defend legal claims, or (iv) you have objected to its use, and we need to verify if we have overriding grounds.

#### vi. Right to Data Portability

You can request your personal data be transferred to you or a third party in a structured, commonly used, machine-readable format. This right applies only to automated data processed based on your consent or performance of contract.

#### vii. Right to Withdraw Consent

You can withdraw your consent at any time if we are processing your data based on your consent.

#### viii. Right to Human Review

You can request a human review of decisions made solely based on automated processing, including profiling, if such decisions impact your rights.

#### ix. Right to File a Complaint

You can file a complaint with a supervisory authority if we violate your rights or legal obligations. The competent authority may depend on your location.

## 11. Third-Party Links

The Platform may include links and social media plugins to third-party websites and applications. Clicking on them may allow third parties to collect or share your data. We do not control or endorse these third parties and are not responsible for their privacy practices. You should review the privacy policies of any external websites or apps you visit.

## **12. Personal Data of Children**

The Platform is not intended for children under 18 years (or older if local laws set a higher age). We do not knowingly collect or use personal data from children. If we learn that a child has provided us with personal information, it will be promptly deleted. Parents or guardians who believe their child's data has been collected should contact us.

## **13. Modifications and Updates**

This Privacy Notice is under regular review, and may be updated at any time. If any changes to this document are made, we will change the "Last Updated" date and version number at the top of this Privacy Notice. Please review this Privacy Notice to check for the updates.