PRIVACY POLICY OF THE COOKIE COMMUNITY WEBSITE

Introduction

This Privacy Policy describes how we, Cookie DAO foundation registered in the Cayman Islands (“COOKIE DAO”, “we”, “our”, “us”, etc.), collect and use your personal data in connection with your use of the Website and the Services.

This Privacy Policy consists of two parts:

● Privacy Notice – which describes how we collect and use your personal data;

● Cookie Notice – which describes how cookies and similar technologies are used.

We provide the Website and the Services subject to the Terms. Please read the Terms before accessing or using the Services or the Website.

Children

The Website and Services are restricted to persons who are at least 18 years of age. We do not knowingly collect personal data from people who are less than 18 years of age in connection with the Website or the Services. If you – the User – are below 18 years old, you may not use the Website or the Services or interact with them.

Definitions

All terms not defined in this Privacy Policy shall have the meaning as defined in the Terms or in the GDPR. The following terms used in this Privacy Policy shall have the meaning set forth below:

● Applicable Data Protection Law – any applicable laws, statutes, regulations, orders, regulatory requirements, bylaws, and other similar legal instruments in force from time to time relating to data protection, data security, privacy and/or the collection, use, disclosure and/or processing of personal data, including but not limited to the GDPR.

● controller, processor, processing, and other terms relating to personal data not defined here have the meaning as defined in Article 4 of the GDPR.

● COOKIE DAO ("we", "our", "us" etc.) - COOKIE DAO foundation company registered in the Cayman Islands, address: Governors Square, #5-204, 23 Lime Tree Bay Avenue, P.O. Box 477, Grand Cayman, KY1-1108, Cayman Islands.

● DLT – distributed ledger technology.

● EEA – European Economic Area.

● GDPR – General Data Protection Regulation 2016/679 of 27 April 2016.

● ICT Systems – the ICT Systems as defined in the Terms.

● personal data – information about identified or identifiable natural persons as defined in Article 4(1) of the GDPR.
● Privacy Policy – this Privacy Policy.

● Terms – the Terms of Service of the Cookie Community Website available at: https://assets.cookie.community/assets/cookie_community_tos.pdf

● User (“you”, “your”, etc.) – the User as defined in the Terms.

Your privacy and blockchain

Blockchain network is an application of a distributed ledger technology (DLT). A distributed ledger is an information repository that keeps records of certain actions (e.g. transactions) and that is shared across, and synchronized between, a set of DLT network nodes using a consensus mechanism. Blockchains are governed by their protocols, i.e. set of rules describing how a network operates (e.g. how a consensus is reached as regards validating a transaction). Such blockchains are intended to immutably record transactions across a wide network of computers and computer systems. Public blockchains are networks that are publicly accessible. Many blockchain networks are decentralized which means that we do not control or operate them.

When you use the Services, some of your data may be recorded on public blockchain networks, depending on the Service and the blockchain protocol. This means that your personal data could be determined directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data. For example, many public blockchain networks are open to forensic analysis or other blockchain analytics operations which can lead to the unintentional disclosure of your personal data such as financial data or information about your transactions.

This is due to the way blockchain technology works, where transparency and immutability of the data stored on the chain is one of the fundamental principles of the technology. Because blockchain networks are decentralized, we (or our affiliates) are not able to delete or change your personal data from such blockchain networks. Please consult relevant information about the potential risks associated with using blockchain technology set out in the Terms.

Changes

The current version of the Privacy Policy has been adopted and is effective as of February 17, 2026.

We may change the Privacy Policy from time to time. For example, we may do this when it is necessary due to changes in the Terms, changes in legal requirements, or changes in the way we use your personal information. We may also amend the Privacy Policy to make it clearer, more accessible, and/or easier for you to understand. You should check the Privacy Policy before using the Website and/or the Services. If we change the Privacy Policy, we will give you access to previous versions of the Privacy Policy.

1. PRIVACY NOTICE

1.1. Controller

We, COOKIE DAO, are the controller of your personal data to the extent this Privacy Policy applies.

1.2. Contact details

You can contact us with any inquiries or complaints in respect of the personal data by email at: community@cookie.community or in writing to our address: Governors Square, #5-204, 23 Lime Tree Bay Avenue, P.O. Box 477, Grand Cayman, KY1-1108, Cayman Islands.

1.3. Sources of personal data

We collect your personal data from the following sources:

1.3.1.You

We collect your personal data from you in connection with your use of the Website or the Services. For example, we collect data when you provide us with the public address of your Wallet when you connect it to the Website.

1.3.2.Automatic data collection

We collect your personal data from your devices or software in connection with your use of the Website or the Services. For example, we may collect information about your device, its operating system or other software, hardware details, web browser settings and so on when you are browsing the Website. We collect this information also when you visit our Website without registration.

1.3.3.Blockchain networks

We collect data from blockchain networks in connection with providing the Services. Such information may include personal and/or anonymous data (please consult Section 1.4.2 for more details).

1.3.4. Third parties

We collect your personal data from third parties in connection with your use of the Website or the Services, including, where applicable, Third-Party Services used for Quests (such as social media platforms or online communicators) and other external services linked to or integrated with the Website.

Please consult Sections 1.4.2–1.4.4 for more details and the Cookie Notice (Section 2) for information about cookies and similar technologies.

1.4. Categories of personal data

We use your personal data only when it is lawful under the Applicable Data Protection Law and only to the extent it is necessary to achieve our purposes (please consult Section 1.5). We collect and use the following types of your personal data in connection with your use of the Website and the Services.

1.4.1.Account data

The account data includes data collected and used in connection with your Account, as well as other basic data, including your contact details. For example, this may include the public address of your Wallet, amount of Cookie Points or Farming Tier assigned to your Account, information about the status of your Quests and so on.

1.4.2.Blockchain data

The blockchain data includes anonymous data and, in some cases, your personal data that we receive in connection with your use of the Services, as well as our activity and the activity of third parties connected with rendering the Services. For example, this includes publicly accessible on-chain information (which can be personal data) and limited off-chain information of technical nature, such as a type of a device, browser version and so on (anonymous data, as a rule). This also includes wallet address which is personal data when the wallet belongs to you, the User. In general, if blockchain data allows for your identification we treat it as personal data in compliance with the GDPR and Applicable Data Protection Law.

1.4.3.Customer support data

The customer support data includes data collected and used in connection with customer support provided by us to you. For example, this may include your communication with us as regards your rights as a consumer, including by telephone or other means of communication, your participation in our surveys or questionnaires or your other requests, questions, and queries.

1.4.4.Social media and online communicators data

The social media data and online communicators data includes data collected and used in connection with your interactions or visits with profiles or accounts on such platforms. For example, this includes the contents of your posts, their metadata (e.g. time of posting) when you post on social media in connection with Quests. We use automatic data collection solutions to collect this information. Please note that such platforms are independent data controllers. Your use of such platforms is subject to the privacy policies and terms and conditions of their providers. We encourage you to consult such documents before using such services. We are not responsible for the privacy policies and practices of such third parties.

1.4.5.Technical data

The technical data includes data collected and used in connection with the ICT Systems. For example, this includes your IP address or other online identifiers, information about your operating system or other software used by your device, hardware details, statistics derived from this data and so on. Most of this information is anonymous data. However, in some cases it may be used to identify you, for example in combination with other data. In such cases we treat it as personal data. Technical data may also be used to perform coarse geolocation and restriction checks where necessary to enforce applicable limitations.

1.4.6.Tracking data

The tracking data includes data collected and used in connection with the use of cookies and similar technologies (if any), such as pixels, beacons, tags, device IDs, or similar tracking solutions.

Where such technologies are used, this may include technical identifiers and information about your interaction with the Website. Please consult the Cookie Notice (Section 2) to learn more about cookies and similar technologies used on the Website.

1.5. Purposes of processing of personal data

We collect and process your personal data in connection with your use of the Website and the Services. As a rule, we process your personal data to the extent necessary to provide the Services, ensure smooth operation of the Website, as well as for other legitimate purposes. You can find the description of such purposes and legal grounds for processing in greater detail below.

1.5.1.Analytics

We use your personal data for analytical and statistical purposes.

1.5.2.Business operations

We use your personal data for the technical and administration purposes in connection with the maintenance and development of our business. For example, this includes internal assessments, audits, products and services development or improvement and so on.

1.5.3.Compliance

We use your personal data to ensure compliance with the applicable law. For example, this includes processing of your personal data to comply with consumer protection law. We also process your personal data to comply with the GDPR, for example when you submit your request as regards your privacy rights and for accountability purposes.

1.5.4.Contract performance

We use your personal data to perform contracts we have executed with you. For example, this includes contracts subject to the Terms under which we provide the Services. This may also include verifying and enforcing contractual and legal restrictions applicable to the

Services (e.g., Restricted Countries and similar jurisdictional limitations) and maintaining audit trails to prevent prohibited use, fraud, or abuse.

1.5.5.Cookies and similar technologies

Where we use cookies or similar technologies, we process personal data in connection with such technologies for the purposes described in Section 1.5 (in particular analytics and security). Please consult the Cookie Notice (Section 2) for details.

1.5.6.Legal rights

We may use your personal data, if necessary, to establish and assert claims or to defend against claims.

1.5.7. Communications (service-related)

We may use your personal data to communicate with you in connection with the Website and the Services (e.g., responding to enquiries, handling complaints, sending service-related notices, and communicating changes to the Terms or this Privacy Policy). Where we conduct direct marketing, we will do so only where permitted by law and, where required, only with your consent.

1.5.8.Security

We use your personal data to ensure the security of the Website and our ICT Systems and to manage them. For example, we record some of your personal data in system logs (special computer programs used for storing a chronological record containing information about events and actions related to the ICT Systems used for rendering the Services by us).

1.6. Legal grounds of processing

We collect and process your personal data in connection with your use of the Website and the Services. As a rule, we process your personal data to the extent necessary to provide the Services, ensure smooth operation of the Website, as well as for other legitimate purposes. You can find the description of such purposes and legal grounds for processing in greater detail below.

1.6.1.Analytics

The legal ground for such processing is our legitimate interest (Article 6(1) (f) GDPR), which consists of conducting analyses of your activity, as well as of your preferences to improve functionalities and services provided by us. Where required by law, we will only conduct analytical activities with your consent. Where we use cookies for analytical purposes, Section 1.6.5 below applies.

1.6.2.Business operations

The legal ground for processing your personal data is our legitimate interest (Article 6(1)(f) GDPR), which consists of maintaining and developing our business operations and improving our products and services.

1.6.3.Compliance

The legal ground for processing is the necessity of processing for compliance with appropriate legal obligation under applicable law to which we are subject (Article 6(1)(c) GDPR).

1.6.4.Contract performance

The legal ground for such processing is the necessity of processing for either taking steps at your request prior to entering into a contract and/or performance of a contract with you (Article 6(1)(b) GDPR). Please consult the Terms for more detailed description of the Services.

1.6.5.Cookies

Where we use cookies or similar technologies, the lawful basis depends on the type of technology and applicable law. Non-essential technologies (e.g., analytics/marketing) will be used based on your consent (Article 6(1)(a) GDPR) where required. Strictly necessary technologies may be used where necessary for performance of a contract (Article 6(1)(b) GDPR) or based on our legitimate interests (Article 6(1)(f) GDPR), as applicable.

1.6.6. Legal rights

The legal ground for such processing is our legitimate interest (Article 6(1)(f) GDPR) consisting of establishing, exercising or defending legal claims and preventing fraud and abuse. Where such processing is necessary for compliance with a legal obligation, the legal ground is Article 6(1)(c) GDPR.

1.6.7. Communications / marketing

The legal ground for service-related communications is the necessity for performance of a contract (Article 6(1)(b) GDPR) and/or our legitimate interest (Article 6(1)(f) GDPR) in communicating with Users and ensuring proper operation of the Website and the Services. Where direct marketing is conducted and consent is required by law, the legal ground is your consent (Article 6(1)(a) GDPR).

1.6.8.Security

The legal ground of the processing is our legitimate interest (Article 6(1)(f) GDPR), which consists of our need to ensure security and safety of our ICT Systems used in connection with the Website and the Services.

1.7. Data recipients

As a rule, we do not share your personal data unless it is necessary. For example, we may share your personal data in connection with the provision of the Services under the Terms. We may disclose your personal data to the following categories of recipients.

We disclose personal data to the categories below only where applicable and to the extent necessary for the purposes described in this Privacy Policy.

• our business partners (including service providers and contractors), such as marketing and advertising services providers, analytical tools providers, payment services providers, data storage providers;

• banks, insurance companies, and/or other financial institutions;

• COOKIE DAO group entities, including our affiliates, subsidiaries and, in the event of a merger, acquisition or reorganisation, the third party involved;

• public authorities or other third parties when required by law and subject to statutory conditions and restrictions;

• professional advisors, such as lawyers, accountants, consultants, and tax advisors;

• other third parties if admissible under Applicable Data Protection Law (e.g. with your consent);

• Third-Parties organising Airdrops / farming pools available through the Website (e.g., project partners) – to the extent necessary to administer your participation, verify eligibility (including Farming Tier / Cookie Points) and enable the distribution process.

We require our partners to keep your data secure and confidential under the terms that ensure a level of protection essentially equivalent to that described in this Privacy Notice. Please note that some of them act on our behalf as our processors and some act as independent controllers of your personal data. If they are controllers of your data, relevant privacy policies and terms and conditions of such controllers may apply. We encourage you to consult such documents before using such services. We are not responsible for the privacy policies and practices of the third parties. Below you can find additional information on selected categories of recipients of your data.

1.7.1.Blockchain network participants

Please note that your use of the blockchain networks in connection with the Services, depending on the blockchain protocol, may result in recording some of your personal data on the blockchain. This means that your personal data could be identified directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data.

1.7.2.Our affiliates and subsidiaries

We share your personal data with our affiliates and subsidiaries. All such entities adhere to the same level of personal data protection as described in this Privacy Notice. In addition, in case of a merger, acquisition or reorganization, we may share your personal data with an involved party. We will ensure that such a third party is obligated to keep your data secure and confidential under the terms that ensure a level of protection essentially equivalent to that described in this Privacy Notice.

1.7.3.Public authorities

We may share your personal data with public authorities where required by law and subject to the statutory conditions and limitations.

1.7.4. Airdrop organisers / project partners

Certain Airdrops and farming pools presented through the Website are organised and controlled by Third-Parties. Where required for participation, we may share limited account-related data (e.g., Wallet address, eligibility signals such as Farming Tier/Cookie Points, and task completion status) with such Third-Parties. Such Third-Parties may act as independent controllers of your personal data and their own privacy policies may apply.

1.8. Obligatory or voluntary provision of personal data

In some cases, provision of your personal data is mandatory by law or necessary to carry out your request or to perform a contract we have with you. If you don't provide us with your personal data in such situations, we may not be able to carry out your request, perform a contract with you (or enter into it) or comply with the law. In some cases, this may mean that we will terminate the contract or stop our engagement with you. For example, if you do not provide your personal data necessary for the complaint procedure, we may not be able to process your complaint. In other cases, provision of your personal data is voluntary. If you don't provide us with your personal data in such situations, we may not be able to carry out your request or achieve our goal. For example, if you do not share your contact details with us, we may not be able to contact you.

1.9. Data storage

We store your personal data only as long as necessary for the purposes we collected it. This means that the duration of storage depends on the purpose of processing. For example, we store your personal data for the period when we provide you the Services in accordance with the agreement we have entered with you subject to the Terms. We store personal data processed based on legitimate interest(s), our or those of a third party, until you lodge an effective objection to such processing. Similarly, when we process your personal data based on your consent, we store it until you withdraw your consent.

The duration of storage or use of your data may be extended in certain situations. For example, we may store your personal data after you terminate the agreement with us when required by law. We may also continue to store and use the same dataset if we use it for a different purpose and on a different legal basis, if admissible by law. For example, if you terminate the agreement with us, we may continue to use personal data provided by you in

connection with your use of the Services when necessary to establish and assert possible claims or to defend against claims (if we have a legitimate interest to do so).

After the end of the period of data storage, we permanently delete or anonymize your personal data.

Please note that use of the blockchain networks in connection with the Services, depending on the blockchain protocol, may result in recording some of your personal data on the blockchain. This means that your personal data could be determined directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data. For example, many public blockchain networks are open to forensic analysis or other blockchain analytics operations which can lead to the unintentional disclosure of your personal data or information about your transactions. This is due to the way blockchain technology works, where transparency and immutability of the data stored on the chain is one of the fundamental principles of the technology. Please consult relevant information about the potential risks associated with using blockchain technology set out in the Terms.

1.10. Data transfers

The level of protection for personal data outside the European Economic Area (EEA) may differ from that provided by EU law. Therefore, where we transfer or otherwise process personal data outside the EEA, we ensure appropriate safeguards in accordance with Applicable Data Protection Law. For this reason, we transfer your personal data to recipients outside of the EEA only when necessary and with an adequate level of protection. We secure the adequate level of protection primarily by cooperating with processors of the personal data in countries for which there has been a relevant European Commission decision finding an adequate level of protection for the personal data. Alternatively, we may use the standard contractual clauses issued by the European Commission. If you want to learn more about these safeguards, obtain a copy of them or learn where they have been made available, contact us (please consult Section 1.2 above).

Due to our establishment in the Cayman Islands and the global nature of our service providers, your personal data may be processed outside the EEA. Where Applicable Data Protection Law requires it, we rely on appropriate transfer safeguards (such as Standard Contractual Clauses or other lawful mechanisms).

1.11. Your rights

To exercise your right(s) contact us (please consult Section 1.2). Under the Applicable Data Protection Law, you have rights including:

● Your right of access - You have the right to ask us for copies of your personal data.

● Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete.

● Your right to erasure (right to be forgotten)- You have the right to ask us to erase your personal data in certain circumstances.

● Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

● Your right to data portability - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. This right applies where we use your data based on your consent or a contract and if the processing of your data is carried out by automated means.

● Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent. You can do this at any time. If you withdraw consent, we will stop using your personal data where the basis for processing is consent. Withdrawal of consent does not affect the lawfulness of processing your data based on consent before withdrawal.

● Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances. You can do this at any time. If you raise an objection, we will stop using your personal data where the basis for processing is our legitimate interest. In exceptional circumstances, we may continue to use your data despite your objection. This exception does not apply when you object to the processing of data for direct marketing purposes, i.e., if you object to it, we will stop processing your personal data on this basis.

● Your right to lodge a complaint - You can lodge a complaint with the supervisory authority dealing with the protection of personal data. You can lodge such a complaint with your local data protection authority.

Please note that due to the nature of the blockchain technology it may be technically impossible, depending on a blockchain protocol, to delete or correct any information recorded on-chain in a public blockchain network. As the blockchain technology operates on a decentralized network, we don’t have any control over such networks.

You don’t usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data protection rights request, contact us using our contact details (Section 1.2.)

1.12. Automated processing and eligibility calculations

Certain aspects of the Services involve automated processing, such as calculating Cookie Points, assigning Farming Tiers, and determining whether a Wallet meets objective eligibility criteria for a given farming pool or Airdrop based on on-chain data and task completion status. This processing is necessary to provide the Services under the Terms.

If you believe an eligibility outcome is incorrect, you may contact us (Section 1.2) and we will review the matter.

2. COOKIE NOTICE

2.1. Introduction

This Cookie Policy describes how Cookie DAO foundation registered in the Cayman Islands (“COOKIE DAO”, “we”, “our”, “us”, etc.) stores or accesses information on your terminal device in connection with your use of the Website or the Services.

2.2. What are cookies?

Cookies are small text files installed on your device that can collect information which generally facilitates use of the Website and the Services. Similar technologies may also be used, for example local storage or tracking pixels. Where we refer to cookies in this Cookie Notice, we also mean such technologies. Where cookies or similar technologies are used, they are used only when admissible by law and, where required, subject to your consent.

Where cookies or similar technologies are used, they are used only when it is admissible by law and, where required, subject to your consent.

2.3. What cookies are used?

At this time, we do not use cookies or other similar technologies that store or access information on your terminal device for analytics or marketing purposes.

If we introduce optional cookies or similar technologies in the future, we will update this Cookie Notice and, where required by law, request your consent before using them.

2.4. Your cookie choices

There are several ways in which you can manage cookies.

2.4.1.Your consent

Optional cookies, for example advertising cookies, are used only with your consent. You can withdraw your consent at any time.

2.4.2.Web browser

You can also manage cookies through your web browser. For example, you can delete all or some cookies from your device or block them. Please note that deleting or blocking cookies (including strictly necessary technologies, if used) may cause the Website or the Services to not function properly or to stop functioning altogether.. To manage cookies through your web browser, refer to the instructions provided by your browser provider. For example, some of such instructions for the relevant web browsers can be found on the websites of their operators: Microsoft (Internet Explorer, Edge), Google (Chrome), Apple (Safari), Mozilla (Firefox), Opera (Opera).

2.4.3.Your rights related to personal data

You have rights related to your personal data as set out in the Privacy Notice (Section 1.11).