

Privacy Policy – Tripppler

Effective date: 25/08/2025

This Privacy Policy explains how Soul Lift Solutions Ltd., a company registered in the Seychelles (registered office: 1st Floor, Room 1, Proton Building, Providence Industrial Estate, Mahe, Seychelles) (hereinafter: “Tripppler”, “Service Provider”, “we”, “us”), collects, uses, stores, and protects personal data when you use the Tripppler service within the Pooolse ecosystem.

1. Data Controller

The controller of your personal data is:

Soul Lift Solutions Ltd. (hereinafter: Service Provider or Tripppler), registered office: 1st Floor, Room 1, Proton Building, Providence Industrial Estate, Mahe, Seychelles

Email: support@tripppler.com

2. Categories of Data Collected

We may process the following categories of personal data provided directly by you during registration and service use:

- Identification data (name, email address, username, wallet address).
- Contact data (email, phone number if provided).
- Account and transaction data (NFT package purchased, USDC payments, affiliate activities).
- Technical data (IP address, browser type, device information, login history).

We do not collect special category data (also known as sensitive data).

3. Purposes and Legal Bases of Processing

Your data is processed for the following purposes:

Contract performance: To provide Tripppler services, process your registration, payments, and NFT package allocation.

Legal obligations: To comply with anti-money laundering (AML), counter-terrorist financing, tax, and other legal requirements, if applicable.

Legitimate interests: To ensure platform security, prevent fraud, and improve service quality.

Consent: For sending you newsletters, marketing materials, or optional communications (you can withdraw consent at any time).

4. Data Sharing

We may share your personal data with:

- Service providers (including IT hosting, payment processors, and affiliate management providers).
- Regulatory and supervisory authorities, if legally required.
- Group companies and ecosystem partners (e.g. Poolse ecosystem entities) to the extent necessary to operate the services.

No data is sold to third parties.

5. International Data Transfers

As the Service Provider is based in the Seychelles, your data may be processed outside the EU/EEA. Where GDPR applies (e.g. EU users), we ensure adequate safeguards (standard contractual clauses or equivalent mechanisms) to protect your data.

6. Data Retention

Account and transaction data: retained for as long as your account is active and up to 7 years thereafter for compliance purposes.

Marketing data: until consent is withdrawn.

Technical logs: up to 12 months.

7. Data Subject Rights

If GDPR applies, you may exercise the following rights:

- Right of access to your personal data.
- Right to rectification of inaccurate data.
- Right to erasure ("right to be forgotten").

- Right to restriction of processing.
- Right to data portability.
- Right to object to processing based on legitimate interests.
- Right to withdraw consent at any time (for marketing communications).

Requests should be submitted to our support email.

8. Security

We apply technical and organisational measures to protect your data against unauthorised access, alteration, disclosure, or destruction. This includes encryption, access control, and regular system monitoring.

9. Affiliate Data Processing

If you participate in the Pooolse affiliate system, your personal data (e.g. referral activity, wallet address for commission payments) is processed in line with the Pooolse Affiliate Rules and Privacy Policy.

10. Changes to this Policy

We reserve the right to update or amend this Privacy Policy at any time. Users will be notified of changes by email or via the platform. The amended policy takes effect from the date indicated above.

11. Governing Law

This Privacy Policy and the processing of your data are governed by the laws of the Republic of Seychelles, without prejudice to mandatory consumer and data protection rights under EU law where applicable.