EMPACTX INC.

Privacy Policy

Effective Date: November 2, 2026 | Last Updated: November 2, 2026

This Privacy Policy explains how EmpactX Inc. ("**EmpactX**," "**we**," "**us**," or "**our**") collects, uses, shares, and protects personal information, and the choices and rights available to you. Please read it carefully. If you do not agree with this Privacy Policy, please do not use the Services.

1. Who We Are and What This Policy Covers

EmpactX Inc., 218 NW 24th Street, Miami, Florida 33127, is responsible for the personal information described in this Privacy Policy (and, where the EU or UK General Data Protection Regulation applies, is the "controller" of that information). This Privacy Policy applies to the following (together, the "**Services**"):

- **empactx.com**, the EmpactX website;
- **app.empactx.com**, the EmpactX app, including the EmpactX Global affiliate platform, MPX membership, the EmpactX Earning Pool interface, and the Buy Bitcoin Miner page;
- **EmpactX Shop** at empactx.shop, including the CEO's Collection and other EmpactX merchandise;
- **EmpactX Blockchain Academy**, a division of EmpactX Inc., and its online courses;
- **EmpactX Mining**, a division of EmpactX Inc., including the EmpactX Miner Ownership Financing Program;
- **EmpactX Whitelabel**, our platform licensing program; and
- our social media pages, customer support, and email and text message communications that link to this Privacy Policy.

The MPX token is issued by Empactus AI LLC, an affiliate of EmpactX, and operates on the Base blockchain. Where Empactus AI LLC processes personal information in connection with the Services, it does so consistent with this Privacy Policy. This Privacy Policy does not apply to third-party websites, wallets, exchanges, or blockchains, which are governed by their own policies.

2. Information We Collect

2.1 Information You Provide to Us

- **Identity and contact information**, such as your name, email address, telephone number, and mailing or shipping address.
- **Account information**, such as your username, password, sponsor or referrer ID, enrollment date, rank, and account preferences.
- **Digital wallet information**, such as public wallet addresses and transaction identifiers you provide or connect. **We will never ask for your private keys or seed (recovery) phrases. Do not share them with anyone.**
- **Miner purchase information**, such as the information you submit through the Buy Bitcoin Miner purchase form (equipment selected, quantity, payment details, Bitcoin payout address), which we use to generate your bill of sale and monthly mining statements.
- **Shop order information**, such as items ordered, shipping details, and order history.

- **Affiliate program information**, such as your sponsor and downline relationships, sales volume, commissions earned, and payout preferences. Where the law requires us to report payments to you, we may also collect tax information such as a taxpayer identification number.
- **Course information**, such as courses you enroll in, your progress, quiz results, and course completion records.
- **Communications**, such as messages you send to customer support, survey responses, feedback, and testimonials.
- **Marketing preferences**, such as your consent to receive email or text messages and your opt-out choices.

2.2 Information Collected Automatically

- **Device and usage information**, such as IP address, browser type, device type, operating system, pages viewed, referring URLs, and the dates and times of your visits.
- **Approximate location**, such as city or country, derived from your IP address.
- **Cookies and similar technologies**, as described in Section 8.

2.3 Information from Other Sources

- **Public blockchain data**, such as transactions on the Base network associated with a wallet address you provide.
- **Platform providers** that host parts of the Services (for example, our website, store, and course platforms), which share order, enrollment, and account information with us.
- **Your sponsor or referring affiliate**, who may provide your name and contact information when referring you to the Services.
- **Data center and hosting partners**, which provide production and performance data for miners you own.

3. How We Use Personal Information

We use personal information to:

- provide, operate, maintain, and improve the Services;
- create and manage your account and verify your identity where needed;
- process miner purchases, issue bills of sale, prepare monthly mining statements, and administer the Miner Ownership Financing Program;
- process and fulfill Shop orders;
- administer the EmpactX Global affiliate program, including tracking enrollments and calculating, reviewing, and paying commissions;
- deliver Academy courses and issue course completion certificates;
- send transactional and service messages, such as receipts, statements, account notices, and policy updates;
- send marketing emails and text messages where permitted by law and, where required, with your consent (see Section 4);
- respond to your questions and requests;

- detect, prevent, and investigate fraud, abuse, security incidents, and violations of our Terms of Service;
- comply with legal obligations, including tax reporting, sanctions, recordkeeping, and lawful requests from authorities; and
- establish, exercise, or defend legal claims.

4. Email and Text Message (SMS) Communications

Email. We may send you marketing emails about EmpactX products, programs, courses, and events. You may opt out at any time by clicking the "unsubscribe" link in any marketing email or by contacting us. Even if you opt out, we will still send transactional and account-related messages.

Text messages. If you provide your mobile number and opt in, you agree to receive recurring automated marketing and informational text messages from EmpactX at that number. Consent is not a condition of any purchase. Message frequency varies. Message and data rates may apply. Reply **STOP** to cancel at any time, or **HELP** for help. Mobile carriers are not liable for delayed or undelivered messages.

We do not sell or share your mobile number or text-messaging opt-in information with third parties or affiliates for their own marketing purposes. Mobile information may be shared only with service providers that help us deliver messages.

5. Legal Bases for Processing (EEA, UK, and Switzerland)

If you are located in the European Economic Area, the United Kingdom, or Switzerland, we process your personal information on the following legal bases:

- **Performance of a contract**, for example, to provide your account, process purchases, pay commissions, and deliver courses;
- **Legitimate interests**, for example, to secure and improve the Services, prevent fraud, and communicate with existing customers, where those interests are not overridden by your rights;
- **Consent**, for example, for certain marketing communications and non-essential cookies, which you may withdraw at any time; and
- **Legal obligation**, for example, for tax, accounting, and regulatory requirements.

6. How We Share Personal Information

We share personal information only as described below:

- **Service providers** that perform services on our behalf, such as website, store, and course hosting; email and SMS delivery; payment and digital asset payment processing; customer support; and IT and security. They may use personal information only to provide services to us.
- **Affiliated companies**, including Empactus AI LLC, for purposes consistent with this Privacy Policy.
- **Your sponsor and upline in the affiliate program**, who may see limited information such as your name, contact information, enrollment date, rank, and sales volume, so they can support you.
- **Data center and hosting partners**, as needed to host, operate, and report on miners you own.
- **Professional advisers**, such as lawyers, accountants, and auditors.
- **Legal and safety purposes**, to comply with law, legal process, or government requests; to enforce our agreements; and to protect the rights, property, or safety of EmpactX, our users, or others.

- **Business transfers**, in connection with a merger, acquisition, financing, reorganization, or sale of all or part of our business or assets.
- **With your consent** or at your direction.

We do not sell personal information, and we do not share personal information for cross-context behavioral advertising, as those terms are defined under U.S. state privacy laws.

7. Blockchain Data

Transactions involving MPX, USDC, Bitcoin, and other digital assets are recorded on public blockchains. Blockchain data, including wallet addresses and transaction amounts, is publicly visible, permanent, and outside our control. **We cannot modify or delete information recorded on a blockchain**, even if you exercise a deletion right. If you link a wallet address to your EmpactX account, others may be able to associate that address with your activity. Please consider this before connecting or disclosing a wallet address.

8. Cookies and Similar Technologies

We and our platform providers use cookies and similar technologies that are necessary to operate the Services (for example, to keep you signed in, remember your cart, and secure the Services) and to remember your preferences. Our website, store, and course platforms may set their own cookies under their own policies. You can control cookies through your browser settings, but disabling certain cookies may affect how the Services work.

We do not currently use third-party advertising cookies or tracking pixels for targeted advertising. If we begin doing so, we will update this Privacy Policy and provide any choices required by law. Where required by law, we treat a Global Privacy Control (GPC) signal from your browser as a valid request to opt out of the sale or sharing of personal information.

9. Third-Party Sites and Services

The Services contain links to and data from third parties, such as DexScreener, BaseScan, GeckoTerminal, Uniswap, the Base app, Coinbase, digital wallet providers, and social media platforms. We are not responsible for the privacy practices of these third parties. Your use of their services is governed by their own terms and privacy policies.

10. Data Retention

We keep personal information for as long as your account is active and as needed to provide the Services, and afterward as necessary to comply with legal, tax, and accounting obligations, resolve disputes, and enforce our agreements. For example, records of miner purchases, financed balances, mining statements, and commission payments are generally retained for at least seven (7) years. Marketing preferences are kept until you opt out (and an opt-out record is kept so we can honor it). When personal information is no longer needed, we delete it or de-identify it.

11. Security

We use reasonable administrative, technical, and physical safeguards designed to protect personal information. However, no system is completely secure, and we cannot guarantee the security of information transmitted to or stored by us. You are responsible for safeguarding your account credentials and the private keys and seed phrases to your digital wallets. EmpactX will never ask you for your private keys or seed phrase.

12. International Data Transfers

EmpactX is based in the United States, and we process and store information in the United States and other countries where our service providers operate. These countries may have data protection laws different from those of your country. When we transfer personal information from the EEA, the UK, or Switzerland, we rely on appropriate safeguards, such as the European Commission's Standard Contractual Clauses and the UK International Data Transfer Addendum, or another lawful transfer mechanism.

13. Your Privacy Rights

13.1 All Users

You may request access to, correction of, or deletion of your personal information, and you may opt out of marketing communications at any time, by contacting us as described in Section 13.5.

13.2 EEA, UK, and Switzerland

Subject to applicable law, you have the right to: access your personal information; rectify inaccurate information; request erasure; restrict processing; data portability; object to processing based on legitimate interests and to direct marketing at any time; and withdraw consent at any time without affecting processing that occurred before withdrawal. You also have the right to lodge a complaint with your local data protection supervisory authority.

13.3 Canada

Subject to applicable law, you may request access to and correction of your personal information and may withdraw consent to certain processing, subject to legal and contractual restrictions. You may also file a complaint with the Office of the Privacy Commissioner of Canada or your provincial privacy regulator.

13.4 United States State Privacy Rights

Residents of California, Colorado, Connecticut, Virginia, Utah, Texas, Oregon, and other states with comprehensive consumer privacy laws may have the right, subject to exceptions, to:

- know and access the personal information we have collected about them, including the categories of sources, purposes, and recipients;
- request deletion of their personal information;
- correct inaccurate personal information;
- receive a portable copy of their personal information;
- opt out of the sale or sharing of personal information, targeted advertising, and certain profiling (we do not sell or share personal information or engage in targeted advertising or such profiling); and
- not be discriminated against for exercising these rights.

California notice at collection. In the past 12 months, we have collected the following categories of personal information described in the California Consumer Privacy Act: identifiers (such as name, email, phone, IP address, wallet address); customer records (such as mailing address and payment details); commercial information (such as purchases, miner ownership, and commissions); internet or network activity; approximate geolocation; and professional information related to affiliate participation. We collect this information from the sources described in Section 2, use it for the purposes described in Section 3, and disclose it for business purposes to the categories of recipients described in Section 6. Where we collect a taxpayer identification number, we use it only to meet tax reporting obligations and not to infer characteristics about you. We retain information as described in Section 10. California residents may also request

information about disclosures to third parties for their direct marketing purposes under California Civil Code Section 1798.83; we do not make such disclosures.

Authorized agents. You may use an authorized agent to submit a request on your behalf. We may require proof of the agent's authority and verify your identity directly.

Appeals. If we decline your request, you may appeal by replying to our decision with the subject line "Privacy Appeal." If you are not satisfied with the outcome of your appeal, you may contact your state attorney general.

13.5 How to Exercise Your Rights

To make a request, email **support@empactx.com** with the subject line "Privacy Request," or call **(305) 330-2303**. We will verify your identity before responding, which may include asking you to confirm information associated with your account. We will respond within the time required by applicable law (for example, within one month under the GDPR or within 45 days under U.S. state laws, which may be extended where permitted).

14. Children

The Services are intended only for individuals 18 years of age or older (or the age of majority in their jurisdiction, if higher). We do not knowingly collect personal information from anyone under 18. If you believe a minor has provided us with personal information, contact us and we will delete it.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will revise the "Last Updated" date above and, for material changes, provide additional notice, such as by email or a notice on the Services. Your continued use of the Services after an update takes effect means you acknowledge the updated Privacy Policy.

16. Contact Us

If you have questions about this Privacy Policy or our privacy practices, contact us at:

EmpactX Inc.

Attn: Privacy

218 NW 24th Street, Miami, Florida 33127

Email: support@empactx.com

Phone: (305) 330-2303