

# Privacy Policy

Last updated: 16 December 2025

## Table of contents:

1. PREAMBLE
2. GENERAL PROVISIONS
3. SCOPE OF APPLICABILITY
4. DATA CONTROLLER (SCOPE AND OBLIGATIONS)
5. DATA CATEGORIES AND SOURCES
6. LEGAL BASIS AND GROUNDS
7. SOCIAL AND COMMUNICATION
8. CUSTOMERS' (USERS') RIGHTS
9. SECURITY OF YOUR PERSONAL DATA
10. THIRD PARTIES
11. AMENDMENTS

## **1. PREAMBLE**

The owner of <https://sx.org> (the “Website”) and the software system (“System”, “Services”) that allows Customers to browse the web by rerouting communications through other users’ devices is SX Networking Ltd. (“Company”, “SX”, “We” and “Our”, “Us”). Since We appreciate your privacy, we have drawn up this Privacy Policy as a means of guiding you (“User”, “Customer” or “You”) to make informed choices while using this System.

This Privacy Policy constitutes a binding legal agreement between you and us. You agree and acknowledge the terms of this Privacy Policy, as amended from time to time, and consent to the data collection, use and sharing of your private information for the preparation as set out in this Privacy Policy by accessing and using the system or providing data to us in other forms.

Unless otherwise provided, this Privacy Policy is subject to the definitions outlined in the Terms of Service, which can be found on the Site. Please consider the Terms of Service, which are incorporated herein by reference, as an addition to this Privacy Policy. The Terms of Service may be applicable to the Parties in all cases not specifically set forth in this Privacy Policy.

For all purposes of the Privacy Policy, “Personal Information” or “Personal Data” shall mean any data that the Customer provides to the Company, the Company collects from the Customer or the Company obtains from third parties that distinguishes or relates to a particular individual. Data that is referred to as “Identifiable Data” or “Individual Data” in appropriate data protection laws, rules or control documents such as Network and Information Systems Directive (“NIS Directive”) and General Data Protection Regulation (“GDPR”) is additionally included in the definition of Personal Information.

## **2. GENERAL PROVISIONS**

This Privacy Policy shall be applicable and interpreted in line with Terms of Service (“Agreement”) which is also available on the Website at the following link: <https://sx.org>. The definitions set out in the Agreement shall be applicable to this Privacy Policy.

The Company shall have the right to unilaterally alter / modify or update this Privacy Policy at any time without prior notice given to the Customer. The continuous use of the Services/System by the Customer shall be deemed as acceptance of Privacy Policy in the last and most updated version. Any Customer shall periodically check and assess the Privacy Policy. Any update of this Agreement comes in force at the moment it is published at the System.

By consenting to the Terms of Service (hereinafter referred to as “Agreement”) in accordance with the rules set out in the Agreement, you also automatically agree to the provisions of this Privacy Policy. For the avoidance of doubt, you acknowledge that by using the System in any way prior to creating an Account (clause 3 of the Agreement) or without logging into the System, you are also bound by this Privacy Policy and your data/information may be collected by the Company automatically.

By NOT consenting to the Privacy Policy to any extent or in any manner, you shall not use or shall immediately stop using the Services, the System or any part thereof, and its features and functionality.

We value the trust you place in us when you use the Services/System. For this reason, privacy and data security are extremely important to the Company. It is very important to the Company that you feel secure when you visit our System and use our Services and in all other business dealings with the Company. Once you use the Company's System/Services, you entrust the Company with the processing of your personal data.

The Company endeavors to offer you the best possible experience with the System so that you can enjoy using the Services now and in the future. For this reason, the Company seeks to understand user behavior on the System in order to continuously improve it. Thus, the processing of your personal data is necessary not only to provide the Services, but also to improve the user experience. Therefore, this Privacy Policy informs you in detail about what personal data the Company collects from you, how the Company processes it and to whom it transfers it. Furthermore, the Company informs you about the precautions it takes to protect your personal data, what rights you have in this context and whom you can contact regarding data protection issues.

In view of the stated above, the Company is committed to protecting your privacy and undertakes to process your personal data in accordance with the following rules and principles:

- › Processing of your personal data shall be carried out lawfully, fairly and transparently.
- › Personal data must be adequate and limited to what is necessary in connection with the purpose for which it is processed.
- › Personal data must be accurate and, where necessary, kept up to date.

This Privacy Policy has been prepared in accordance with law of European Union in particular according to the General Data Protection Regulation (“GDPR”), Network and Information Systems Directive (“NIS Directive) and other relevant legislation, as well as best practices and data protection principles.

Concerning the terms used in the Privacy Policy, such as “Data Controller”, “Processing”, the Company refers to the definitions used in General Data Protection Regulation as well as in Network and Information Systems Directive.

### **3. SCOPE OF APPLICABILITY**

This Privacy Policy applies to all individuals who utilize the System/Services or otherwise interact with the Company (e.g. business partners, interested parties, service providers, etc.). For the purposes of this Policy, these individuals will be referred to as "Customer" or "You".

Our system and services are designed for use by adults only, as they contain material that may not be appropriate for minors. We do not knowingly collect personal data from individuals under the age of 18, in accordance with the relevant data protection laws. If you are under the age of 18 or under the age of majority in your state, country, or jurisdiction, please refrain from using our system and services.

If you are a representative of a company that uses the Company's System/Services, you should be aware that the Company shall also collect your personal data in accordance with this privacy policy.

It is your responsibility to ensure that you are eligible to use the Company's System and/or Services.

### **4. DATA CONTROLLER**

In accordance with the relevant data protection legislation, the Company is typically designated as the "Data Controller" in relation to any personal information provided to us. In certain instances, the Company may act as a “Processor” in accordance with specific contracts, processing personal data solely in accordance with the instructions of the data controller or as otherwise permitted by law.

This Privacy Policy applies to the processing of personal data by the Company, acting as a Data Controller, in relation to individuals (Customers), regardless of their place of residence or activity, in accordance with applicable data protection laws.

If you have any questions regarding the processing of your personal data and the exercise of your rights under the GDPR, NIS Directive, you can contact our team via the following email address: [support@sx.org](mailto:support@sx.org)

The Company may require you to provide additional identification for certain request to ensure that your personal data is only shared with you.

The Company, as Data Controller has the following obligations:

- › *Data Transfer*. The Company shall not transfer personal data to a country or territory outside the European Union unless that country provides an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
  - If an adequate level of protection is not provided, exceptions shall be made by: a) establishing adequate protection through appropriate safeguards (e.g. standard contractual clauses), or b) obtaining the data subject's explicit consent and ensuring that the transfer is not contrary to the interests of the public security of the European Union.
- › *Records of data processing*. The Company shall keep records of data processing at its discretion, unless such records are required by law.
- › *Establishment of a data protection directive*. The Company shall establish a directive to provide all its employees with appropriate data protection guidelines to ensure that data protection requirements are properly implemented and procedures are streamlined. The direction should be regarded as a necessary minimum for compliance with data protection requirements.
- › *Notice of Data Breach*. The Company endeavors to protect your personal data in the best way possible. However, data breaches sometimes occur, and such events may occur for a variety of reasons.
  - In the event of a data breach that may compromise the confidentiality, privacy and security of a data subject's personal data, the Company, as data controller, must notify the Data Controller immediately upon becoming aware of such a breach.
  - The required notification shall include information such as: the nature, category, causes, approximate number and records of the data breach, a description of the likely consequences of the data breach, and a description of the remedial measures and actions taken by the controller to address the data breach.
- › *Retention of Data*. The Company must not retain personal data after the purpose for which the data was processed has been completed, unless the identity of the data subject can no longer be identified through the use of anonymization techniques.
- › *Protection of sensitive personal data*. In general, the Company does not process special categories of personal data of Customers. This includes data revealing racial or ethnic origin, political opinions, religious or ideological beliefs, trade union membership, and genetic and biometric data. In some cases, in addition to the verification data itself (e.g. screenshots of identity documents and identification data

from them, place of residence, status of politically exposed persons, video data, etc.), biometric data (e.g. personal data obtained through special technical processing in connection with physical, physiological or behavioral characteristics of a person and data for clear identification of a person, e.g. facial images, fingerprint data) are recorded during verification. Such processing of biometric data is carried out solely on the basis of your express consent, which you may withdraw at any time.

- › *Appropriate agreements between the controller and the processor.* The Processor shall perform and carry out the processing of personal data on the basis of instructions from the controller and in accordance with the contracts and agreements concluded between them, which shall specifically define the scope, subject matter, purpose and nature of the processing, the type of personal data and the categories of data subjects. The company acting as controller or processor must ensure in advance that such contracts are in place and are appropriate for the planned data processing.

## **5. DATA CATEGORIES AND SOURCES**

The Company retains the right to collect personal information from you in the course of providing the Services, when you use the System, contact us or request information from us, or as a result of your relationships with any of our employees or customers.

The personal information we may process includes:

*Contact details.* When you create a new user account or communicate with the Company (e.g. when contacting our support team via email or telegram) we may process basic data such as your email address and other contact information that may be required additionally.

*Ordering Data.* In the context of ordering Services, we may process information relating to the matter for which you are requesting our Services.

*Financial Data.* In the context of ordering Services and accepting payments and making refunds or processing withdrawals in connection with the Affiliate Programme (or any other applicable program / offer), we may process, for example: payment service provider information, payment details, transaction ID (hash), etc.

*Access data.* When you access the System (website) and use the Services, we may process, for example: IP address, your location, location data, traffic data, transaction data (e.g. deposit, payment, withdrawal address), computer or mobile device information, frequency, time, duration of visits and other page interaction data, operating system, browser type, device type, unique device identification number, cookie identification files, optional form data, crash reports, data about the user's browsing habits, and other data about your browsing behavior.

At any time when you use the System / Services, we collect and process the following log data:

- The IP address of the first or last login.
- Credentials and other information, including the date and time of account creation and the date and time of login.
- Information collected through cookies and Google Analytics, such as: browser type, web pages you visit and the time you spend on them, access times and dates, unique device identification number and other. The data mentioned in this paragraph may be collected without being linked to a specific user.

*Company Data.* If you use the Services / enter into a commercial agreement with the Company as a legal entity, we may process, for example: commercial register reports, data on or relating to beneficial owners, records or additional information on recent, past or planned business activities, other data necessary to determine / confirm the structure, beneficial owners or any powers of attorney from the Company, etc.

*Marketing Data.* If you visit the System or our social media sites, we may process statistical and marketing data, such as: number of visitors, frequency, clicks, times, locations, target groups, data from cookies and similar technologies, consumer behavior, interests and preferences, data from market research and surveys of target groups, etc.

## **6. LEGAL BASIS AND GROUNDS**

We process all kinds of your personal data in accordance with the GDPR, NIS Directive and other legislation that would be applicable in regards to Personal Data Protection Requirements. We process your personal data on the basis of at least one of the legal grounds set out below. If the Company requests the provision of other personal data that have not been described, this data, as well as the purpose and legal basis for collection and processing, shall be communicated to the Customer at the time of collection of the personal data.

**Fulfilment of contractual obligations under the Agreement.** The Controller (Company) / Processor may process personal data without the consent of the data subject (Customer) to whom the data relates, if the processing is necessary for the fulfilment of a contract (Agreement) to which the data subject is a party, or to take action at the request of the data subject to enter into, amend or terminate the contract.

**Consent.** We may ask you to provide your consent where the data subject's consent (yours) is the lawful basis for processing your personal data. For example, we may ask you to provide consent before using the System prior to entering into an Agreement or



when you use the System without logging in, and before collecting/processing any other personal data not described in this Privacy Policy.

If you have granted us consent to process your personal data, we will only do so for the purposes and to the extent specified in your consent statement.

*You may withdraw your consent at any time without providing an explanation. If you choose to do so, it shall take effect immediately and will shall to all future processing.*

In accordance with your consent, we process data for the following purposes, for example:

- › We may also use your data for direct marketing and advertising purposes, including the sending of customer satisfaction surveys, newsletters, sweepstakes and other promotional communications. By creating an account, you consent to receive direct marketing and advertising communications. By creating an account, you confirm that you are aware that the contact information provided to the Company may be used by the Company for direct marketing, advertising and other electronic communications. By creating an account, you consent to receive marketing and promotional materials.
- › The analysis and tracking of the website for advertising purposes.
- › The use of audio, video and photographic data (e.g. adverts, interviews, etc.) for marketing and other representational purposes through various channels.
- › An automated authentication process (identity verification).
- › An application management system, recruitment process and processing of your application.

**Compliance with all applicable legal obligations.** It may also be necessary to process personal data in order to comply with various legal obligations. Examples of legal obligations that require the processing of personal data include contract management, accounting and invoicing, monitoring to prevent fraud, misuse, money laundering and terrorist financing, providing information to criminal authorities in the context of fiscal criminal proceedings or prosecution to official orders, assessing the working capacity of the employee or the provision of health/social, etc.

**Protection of legitimate interests.** In certain instances, data processing may be necessary beyond the performance of the contract to safeguard the legitimate interests of the Company or a third party. The following data processing operations are carried out in the interest of the Company's legitimate interests:

- › The prevention of fraud, misuse (for example, for illegal purposes), money laundering and terrorist financing.



- › Risk management and risk minimization are achieved, for example, through credit agency and debtor directory enquiries or the use of business analysis providers.
- › Identification and examination of potentially incorrect or suspicious business cases and access to our websites (e.g. website analysis via Sift Science).
- › The transfer of data within the Company for the purpose of internal administration.
- › Account management and processing of general Customers' requests and enquiries.
- › We take the security of our customers, partners and employees seriously. This includes measures to protect our network and information, as well as our property. Examples of these measures include video surveillance, external data centers and service providers.
- › The processing of inquiries from authorities, lawyers, and collection agencies in the context of legal prosecution and enforcement of legal claims in the context of legal proceedings.
- › The further development of our services and products, as well as the management and research of the market in which we operate.
- › The processing of statistical data, performance data and market research data via the website, the app or social media platforms (e.g. Facebook, LinkedIn, YouTube etc.).
- › The processing of customer preferences (e.g. language, region) via cookies on our website.
- › The direct marketing and advertising (e.g. implementation of marketing strategies, targeting of Customers, dispatch of vouchers, advertisement from the Company and its partner companies).

The Company may also process personal data without the consent of the data subject to which the data relates where the data has been made public by the data subject.

## **7. SOCIAL AND COMMUNICATION**

The Company maintains an active social media presence on a variety of platforms to facilitate communication with its customer base, prospective customers and interested social media users about its services, products and other news. Please note that the general terms and conditions and privacy policies of the social media platforms in question also apply when accessing them. Please note that user data may be processed outside of the European Union or your current region/location. This can result in risks for users due to

differing legal frameworks (for example, the enforcement of data subject rights may be more challenging).

As part of the technical process of various social media platforms (e.g. Google, Facebook, X, etc.), when a user clicks on a content item or a website, the platform determines whether the user is logged into their social media account at the time. Please note that social media platforms collect this information and associate it with your social media accounts, even if you do not click on the content on that platform. By logging out of your accounts, you can prevent these companies from associating the collected information with your accounts.

The activities of these companies are not under our control, and therefore we cannot accept liability for any damage you may suffer as a result of the use of your data by these companies.

The Company may only process personal data from social media users if they communicate directly with the Company via such platforms. This may include, but is not limited to, visitor numbers, posted articles, likes, direct messages, customer inquiries, comments, and other forms of communication. In such instances, the Company assumes responsibility for the processing of personal data collected. It should be noted that, in addition to our own data processing activities, other providers, in particular social network and platform operators, also process personal user data. We have no influence over this data processing and are not responsible for it. The data processing takes place exclusively within the remit of the other providers.

## **8. CUSTOMERS' RIGHTS**

The Customer shall have the following rights:

**You have the right to withdraw consent and opt out.** In all cases, you are entitled to object to and suspend the processing of your personal data where the processing is performed for direct marketing purposes or for statistical survey purposes. If you do not consent to receive direct marketing and advertising material in any scope or way, you must either:

- › Do not complete the account creation process.
- › After account creation, withdraw your consent by clicking the "Unsubscribe" button in the email received from the Company after account creation.
- › At any other time, withdraw your consent by clicking the "Unsubscribe" button indicated in any other email from the Company sent as a direct marketing and/or advertising material.

- › You may withdraw your consent at any time, in accordance with the procedures set forth in this Privacy Policy or by contacting us via email at [support@sx.org](mailto:support@sx.org). Please be advised that if you withdraw your consent, we may no longer be able to offer you all of our services. Withdrawing consent does not affect the legal basis for processing your personal data up until the point of withdrawal.
- During the registration process (creation of an account) or when an update is made following a successful login, by checking the appropriate box, you are confirming that you have read and understood the terms set out in this agreement, including the privacy policy, and that you agree to the processing of personal data in accordance with those terms.
- By checking the respective box during the registration process (creating an account) or when updating after logging into your account, you confirm that you have read and understood the other policies as indicated in the relevant notice.
- By creating an account, you consent to receiving direct marketing and advertising material, as well as other electronic communication.
- By selecting the relevant option during the System usage for Cookies, you expressly consent to the usage of Cookies as indicated in this Policy, the notice and in accordance with your preferences, as indicated by your selection of all/any boxes.

**You have the right to obtain further information on request**, including:

- › Confirmation of whether we process personal data related to the Customer.
- › Details of the personal data being processed about the data subject.
- › Decisions taken on the basis of automated processing.
- › Rules and criteria for the periods for which the personal data will be stored and kept.
- › Measures to be taken in the event of a data breach.

**Right to rectification.** You are entitled to request the rectification of any inaccurate personal data concerning you, and to have any incomplete personal data completed.

**Right to erasure.** You are entitled to request that the Company delete your personal information in the following circumstances:

- › The personal data is no longer necessary in relation to the purposes for which it was collected or processed.

- › You withdraw your consent or express objection to processing and there are no legitimate grounds for the Company to continue the processing.
- › The personal data have been processed in a manner that violates the law.
- › The deletion of personal data is necessary to comply with a legal obligation to which the Company is subject.

In all cases, we kindly request that you contact us directly. We believe that the best decisions can be made through mutual agreement and effort.

In general, the Company processes personal data only for the purposes for which it was collected. In exceptional cases, we may process your personal data for a purpose other than that for which it was originally collected. In this case, we shall inform you of the following before we begin processing your data: the purpose for which we intend to process your data, the duration for which we will store your data, your rights as a data subject, the possibility of revoking consent, the existence of a right to complain to the data protection authority, whether the provision of your data was necessary on legal or contractual grounds, and the possible consequences of non-provision.

## **9. SECURITY OF YOUR PERSONAL DATA**

Data security is a top priority for our Company, and we are firmly committed to protecting the data we collect. We employ a comprehensive range of administrative, technical and physical measures to safeguard your personal data from accidental, unlawful or unauthorized destruction, loss, modification, access, disclosure or use. These measures comply with the highest international security standards and are subject to regular review to ensure continued effectiveness and suitability in meeting the desired security requirements.

The following technical, physical and organizational measures have been implemented:

- › Two-factor authentication (“2FA”) for the system.
- › Ensuring the confidentiality, integrity, availability and fault tolerance of our system and services.
- › Use of encrypted systems.
- › Pseudonymization and anonymization of personal data.
- › Ensuring that access to our offices and systems is strictly controlled, and that data is transmitted in a secure manner.

- › Measures to rapidly restore the availability of personal data in the event of a physical or technical incident.
- › Measures to ensure that privacy is built into our platform from the outset, for example, by preventing user enumeration.
- › Implementation of procedures for the regular review, assessment and evaluation of the effectiveness of the technical and organizational measures to ensure the security of processing.
- › Internal IT security practices and monitoring, internal communication and fast response approach.
- › Incident-response management.

Please note that your personal data may be accessed, transferred and/or stored by employees or suppliers at a destination outside the country in which you are located. The data protection laws of these countries may be of a lower standard than those in the United Arab Emirates. Nevertheless, we will always safeguard personal data in accordance with this Privacy Policy.

If we process personal data in a third country (for example, inside the United Arab Emirates (UAE)) or if this happens in the context of the use of third-party services or disclosure and/or transfer of personal data to third parties, we only transmit personal data for the performance of our pre/contractual obligations based on our consent, a legal obligation or our legitimate interests.

In accordance with legal and contractual obligations, we only process or permit the processing of personal data in a third country when the necessary conditions are in place to ensure an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. This means, for example, that the processing and transmission is carried out on the basis of special guarantees, such as compliance with a code of conduct or a certification mechanism, as well as binding and enforceable commitments from the recipient in the third country to apply the appropriate guarantees for the protection of the data or comply with officially recognized special contractual obligations (for example, those announced by the European Commission and known as "Standard Contractual Clauses").

## **10. THIRD PARTIES**

The Company shall only transmit your personal data in accordance with the descriptions below or as part of an instruction provided at the time the data was collected from the Customer. Furthermore, we shall not sell or otherwise transfer any personal data collected about you to third parties.

The Company's departments and employees who require access to your personal data in order to fulfil contractual and legal obligations and pursue legitimate interests shall be granted such access. We transfer personal data for the purpose of our day-to-day business operations, including account management and other processes requested by you, as well as for the efficient performance of internal administrative activities in a joint manner and for the maintenance and improvement of our products and services.

In limited instances, we also transfer personal data to data processors who provide services for us, including IT, legal, customer support, website improvement, contract performance, account management, accounting, invoicing, application management, marketing, and the sending of marketing material. Data processors may only use or pass on this data insofar as is necessary to provide services for us or to comply with legal regulations. We have contractual obligations in place with these processors to guarantee the confidentiality and security of your personal data that they process on our behalf.

We may also transfer your personal data in the following circumstances:

- › If we are required to do so by law or during legal proceedings;
- › If we believe that disclosure is necessary to avoid damage or financial loss;
- › In connection with an investigation into suspected or actual fraudulent or illegal activities.

In the event that the Company acts in connection with other parties as joint controllers (e.g. in the processing of data for jointly defined purposes within a group of associated entities), we may provide those parties with personal data, where applicable, and based on at least one of the legal grounds. In the event of joint controllership, the transfer of your personal data is only conducted in accordance with a duly executed agreement with our partners.

The Company may transmit your personal data to another person at the request of the individual concerned, with your consent, for the transfer or for the purpose of fulfilling the contract, or in order to take steps at the request of the data subject prior to entering into a contract.

## **11. AMENDMENTS**

The Company is entitled to amend this Privacy Policy at any time. Should the Company make any changes, it will alter the date of the last update indicated below. The Customer shall independently verify such changes. Any updates to this Privacy Policy shall be effective from the date of publication on the Website (date of the last update).



In the event of material amendments, the Company shall retain the right to update the Privacy Policy subject to an appropriate update notice and regardless of the Customer's consent. If the Customer disagrees with the revised version of the Privacy Policy, the Company shall be entitled to suspend the use of the System that requires processing of the Customer's data by the Company.