

# UBELLO – PRIVACY POLICY

**LastUpdated:** [11/29/2025]

This Privacy Policy ("Policy") explains how UBELLO ("UBELLO", "we", "our", or "us") collects, uses, and protects your information when you access or use the UBELLO mobile application, website, or any related services ("UBELLO Platform" or "Services").

**By accessing UBELLO, you acknowledge that you have read and agreed to this Policy.** If you do not agree, you must stop using UBELLO immediately.

## **IMPORTANT NOTICE: NON-CUSTODIAL NATURE**

UBELLO is built as a non-custodial Web3 application, following a strict minimal-data model. This means **we do not store private keys, seed phrases, wallet credentials, or any sensitive blockchain access information.**

Any capitalized terms in this Policy have the same meaning as in the UBELLO Terms of Use.

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## **1. THE INFORMATION WE COLLECT**

UBELLO collects only the minimum amount of data needed to operate and improve the Platform. We do not collect private keys, seed phrases, PINs, or wallet passwords. We may collect the following categories of information:

### **1. Profile Information**

Information you provide when creating an optional UBELLO account (if applicable), including:

- Name or username.
- Email address.
- Phone number.
- Country/region.
- Any information you voluntarily add to your profile.

*Note: Creating an account is not required to use your UBELLO Wallet, since wallet access is fully non-custodial.*

### **2. Transaction & Interaction Information**

- On-chain transaction details (hash, timestamp, network).
- Actions you perform through the UBELLO interface (e.g., connecting to Marketplace, buying an eSIM, minting NFTs).
- Interaction logs with our smart contract interfaces.

**UBELLO does not log or store your private keys, signatures, or seed phrase.**

### 3. Technical Information

Automatically collected to operate the app smoothly:

- Device model and operating system.
- IP address (may be anonymized).
- App performance data and crash logs.
- Language, time zone, and basic diagnostic information.
- Cookies or similar technologies for analytics and personalization.

### 4. Marketplace & Third-Party Information

If you use services such as eSIM, travel bookings, gift cards, partner rewards, or NFT membership utilities, UBELLO may receive limited information from those providers to complete your request (e.g., order ID, delivery status).

We do not control how third-party partners process your data. **You should review their privacy policies before using their services.**

### 5. Support Information

When you contact UBELLO Support, we may collect:

- Email address.
- Inquiry details.
- Screenshots/logs you provide voluntarily.

## 2. COOKIES & TRACKING TECHNOLOGIES

UBELLO uses cookies and similar tools for:

- Performance analytics.
- Security monitoring.
- Basic personalization.
- Faster login (if you use UBELLO account features).

You can disable cookies via browser/app settings, but certain features may not function optimally.

## 3. HOW WE USE YOUR INFORMATION

UBELLO uses your information to:

- Provide and improve UBELLO's core functionality.
- Facilitate interactions with decentralized networks or Marketplace services.
- Detect and prevent fraud, spam, or abuse.
- Analyze app performance and stability.
- Communicate updates, new features, or critical notices.
- Comply with legal or regulatory requirements.
- Ensure safety and integrity of the UBELLO ecosystem.

**We never use your data for unauthorized tracking or selling to third parties.**

## 4. HOW WE SHARE YOUR INFORMATION

**UBELLO does not sell your personal data.** We may share limited information only with:

1. **Service Partners:** To fulfill your request (e.g., eSIM delivery, voucher redemption).
2. **Cloud, Infrastructure & Analytics Providers:** Who help UBELLO operate securely and reliably.
3. **Legal Authorities:** Only when required by applicable law, to prevent fraud, respond to lawful requests, or protect UBELLO, its users, or public safety.
4. **Business Transfers:** If UBELLO engages in a merger, acquisition, or restructuring, only necessary information may be transferred.

**UBELLO will never share your private keys, wallet credentials, or blockchain access information—because we do not collect them.**

## 5. HOW WE STORE & PROTECT YOUR INFORMATION

We use industry-standard security practices, including encryption, secure cloud infrastructure, data minimization, and access control protocols. However, no system is 100% secure.

**Blockchain-related risks:** Because UBELLO is non-custodial, the security of your wallet depends on your device and your handling of the seed phrase. UBELLO cannot recover lost credentials.

## 6. HOW LONG WE KEEP YOUR DATA

We retain your information only for as long as necessary to:

- Provide the Services.
- Comply with legal obligations.
- Resolve disputes.
- Improve UBELLO's functionality.

You may request deletion of your UBELLO account data at any time. **On-chain transactions cannot be deleted, as they are permanently recorded on public blockchains.**

## 7. YOUR RIGHTS

Depending on your jurisdiction, you may:

- Access your personal information.
- Update or correct your data.
- Request deletion of your information.
- Withdraw consent (where applicable).
- Object to certain processing.
- Request data portability.
- Submit complaints to your local data authority.

To submit a request, contact: [salescore.me@gmail.com](mailto:salescore.me@gmail.com)

## 8. CHILDREN'S PRIVACY

UBELLO is not intended for individuals under 18 years of age. We do not knowingly collect data from minors. If you believe a minor is using UBELLO, please contact us for immediate removal.

## 9. EXTERNAL LINKS

UBELLO may contain links to third-party websites or services. We are not responsible for their privacy practices. Please review their policies before interacting with them.

## 10. CHANGES TO THIS POLICY

UBELLO may update this Policy from time to time. We will notify users through in-app alerts, email notices, or an updated "Last Updated" date. Your continued use of UBELLO means you accept the updated Policy.

## 11. GOVERNING LAW

This Policy follows the same governing law and dispute resolution rules as the UBELLO Terms of Use.

**For South Korea residents:**

Laws of South Korea; jurisdiction of Seoul Central District Court.

**For all other users:**

Laws of Vietnam; arbitration by VIAC in Ho Chi Minh City (Language: English).

## 12. CONTACT US

If you have questions or privacy concerns, please reach out:

**[salescore.me@gmail.com](mailto:salescore.me@gmail.com)**