

# Minara – Privacy Policy

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## 1. Overview

This Privacy Policy (“Policy”) describes how Minara (“Minara,” “we,” “us,” or “our”) collects, uses, stores, and shares personal information when you access or use our crypto AI platform, including the web application, mobile applications, Autopilot trading features, perpetual contract services, and all associated tools and interfaces (collectively, the “Services”). By using the Services, you acknowledge that you have read and understood this Policy and consent to the collection and use of your information as described herein.

This Policy should be read alongside our Terms of Use, which governs your use of the Services and is incorporated by reference.

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## 2. Information We Collect

We collect information in three primary ways: information you provide directly, information generated automatically through your use of the Services, and information obtained from third-party systems.

### 2.1 Information You Provide

- **Account information** – email address, hashed password, social media accounts you linked, and subscription tier.
- **Identity verification data** – where required by applicable law or our compliance procedures, government-issued identification documents and related verification materials.
- **Support interactions** – messages, attachments, and communications you send to our support team.

### 2.2 Financial and Trading Data

- **Deposit and withdrawal records** – transaction amounts, timestamps, originating and destination wallet addresses, and network confirmation data.
- **Account balances** – current and historical balances held in your Account Abstraction (“AA”) wallet (signer infrastructure provided by Particle Network).
- **Perpetual Wallet data** – balances, positions, order history, funding rate payments, liquidation events, and margin information associated with each perpetual contract Perpetual Wallet linked to your account. You may

operate multiple Perpetual Wallets simultaneously under a single Minara account; data from all such wallets is collected.

- **Transaction history** – a complete record of all on-chain and off-chain transactions executed through the Services, including those initiated by the Autopilot feature on your behalf.
- **Wallet export events** – timestamps, wallet identifiers, and metadata of any wallet private-key export actions you initiate through the in-app export flow. The exported key material itself is delivered directly to you.

### 2.3 Autopilot and Strategy Data

- **Autopilot authorizations** – records of your consent to activate, modify, pause, or revoke Autopilot trading on a specific Perpetual Wallet, including the strategy selected (official Minara strategy or, when available, user-generated strategies), authorization timestamps, and any parameter configurations you set.
- **Strategy execution logs** – a full audit trail of every trade, order, modification, or cancellation executed by the Autopilot system on your behalf, including the strategy version in effect at the time of execution.
- **Strategy performance data** – realized and unrealized profit and loss, win rates, drawdown metrics, and other performance statistics generated from Autopilot activity.

### 2.4 Usage and Technical Data

- **Device and environment data** – device type, operating system, browser type and version, IP address, and time zone.
- **In-app behavioral data** – pages visited, features accessed, click events, session duration, and error logs.
- **AI interaction logs** – prompts you submit to the Minara AI agent, conversation transcripts, and AI-generated outputs. These logs may include trading instructions you communicate to the AI.

### 2.5 Cookies and Tracking Technologies

We use cookies and similar technologies for session management, fraud prevention, security monitoring, and analytics. You may control non-essential cookies through your browser settings; however, certain cookies are required for the Services to function and cannot be disabled.

### 2.6 Minors

The Services are intended solely for users who are at least 18 years of age. We do not knowingly collect personal information from anyone under 18. We do not currently perform identity verification or age verification at the point of registration. If we become aware that personal information has been collected from a user under 18, we will take reasonable steps to delete that information

and terminate the associated account as promptly as practicable. If you believe a minor has registered for the Services, please notify us at [team@minara.ai](mailto:team@minara.ai).

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### 3. How We Use Your Information

We use the information we collect for the following purposes:

Purpose	Legal Basis / Justification
Operate and deliver the Services, including executing trades and displaying portfolio information	Performance of contract
Provision and management of AA wallets and perpetual contract Perpetual Wallets	Performance of contract
Executing Autopilot trades on your behalf pursuant to your authorization	Performance of contract; explicit consent
Monitoring Autopilot strategy performance and generating audit logs	Performance of contract; legitimate interest
Improving AI models, trading algorithms, and platform performance (using anonymized data only)	Legitimate interest
Sending transactional communications (e.g., deposit confirmations, liquidation alerts, Autopilot activity notifications)	Performance of contract
Enforcing our Terms of Use and investigating abuse, fraud, or market manipulation	Legitimate interest; legal obligation
Complying with applicable laws, regulations, and lawful authority requests	Legal obligation
Sending optional marketing communications (with opt-out available)	Consent

We do not use your personal financial data or trading history to train AI models without first anonymizing or aggregating such data so that it cannot be attributed to you individually.

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### 4. Sharing of Information

We do not sell your personal information. We may share your information in the following circumstances:

**Infrastructure and service providers.** We share data with hosting, payment processing, analytics, security, and wallet infrastructure vendors under strict

data processing agreements (“DPAs”) that prohibit commercial exploitation of your data.

**Perpetual DEX and blockchain infrastructure.** To operate the perpetual contract features, we transmit necessary transaction data (including wallet addresses, order parameters, and margin instructions) through our infrastructure—including dedicated nodes we operate for execution performance—to the applicable Perpetual DEX protocol and its underlying blockchain network. Such nodes act solely as relay infrastructure and do not alter the terms or outcome of your transactions. Once broadcast to the network, this data is processed on a public, permissionless blockchain and is inherently visible on-chain. Minara does not control any Perpetual DEX protocol’s consensus rules, smart contracts, or validator set.

**Autopilot strategy providers.** When you activate an Autopilot strategy, anonymized performance data may be shared with the strategy’s creator for the purpose of performance attribution and improvement. Your personal identity and account details are not shared with strategy authors.

**Legal and regulatory authorities.** We may disclose your information in response to lawful requests from government authorities, courts, or regulators, or where we reasonably believe disclosure is necessary to protect the safety of any person, prevent fraud, or comply with applicable law. We will notify you of such requests unless legally prohibited from doing so.

**Corporate transactions.** In connection with a merger, acquisition, asset sale, or similar transaction, your information may be transferred to the acquiring entity, subject to equivalent privacy protections.

**At your direction.** We may share information with third parties when you explicitly instruct us to do so.

**Aggregated or anonymized statistics.** We may share aggregated, non-personally identifiable data with partners, researchers, or the public for analytical or promotional purposes.

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## 5. Blockchain Data and Public Ledger Notice

You acknowledge that transactions executed through the Services, including those initiated by the Autopilot feature, are recorded on public blockchains. Blockchain records are immutable and publicly accessible. While Minara takes steps to protect your identity, the on-chain wallet addresses associated with your account and all transactions made from those addresses are permanently visible on the public ledger. Minara cannot delete or modify on-chain transaction records.

## 6. Security

We implement industry-standard security measures to protect your personal information, including Transport Layer Security (TLS) encryption for data in transit, hashed credential storage, role-based access controls, and regular security audits.

While we take reasonable precautions, no system is perfectly secure. You are responsible for maintaining the confidentiality of your account credentials and for promptly notifying us at [team@minara.ai](mailto:team@minara.ai) if you suspect unauthorized access to your account.

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## 7. Data Retention

We retain personal data only for as long as necessary to:

- Deliver and improve the Services;
- Comply with applicable legal and regulatory requirements (including anti-money laundering record-keeping obligations, which may require retention for five years or longer); and
- Resolve disputes and enforce our rights.

When data is no longer required for these purposes, it is securely deleted or irreversibly anonymized. Note that on-chain transaction records cannot be deleted due to the immutable nature of public blockchains.

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## 8. Your Choices and Rights

Depending on your jurisdiction, you may have the right to:

- **Access** a copy of the personal information we hold about you;
- **Correct** inaccurate or incomplete account information;
- **Delete** your personal data and close your account (subject to legal retention obligations);
- **Restrict** or object to certain processing activities;
- **Portability** – receive your data in a structured, machine-readable format;
- **Withdraw consent** for optional processing activities (e.g., marketing communications, Autopilot activation) at any time without affecting the lawfulness of prior processing.

The following categories of data are available for access or export upon request:

- AI interaction logs
- Autopilot authorization records and strategy execution logs
- Wallet activity logs
- Account information

To exercise any of these rights, submit a request to **team@minara.ai**. We may ask you to verify your identity before processing your request. We will respond within the timeframe required by applicable law.

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## **9. Updates to This Policy**

We may revise this Policy from time to time to reflect changes in our Services, legal requirements, or data practices. Material changes will be communicated in-app or via email with reasonable advance notice before taking effect. The “Last updated” date at the top of this Policy will always reflect the most recent revision. Continued use of the Services after the effective date of any update constitutes your acceptance of the revised Policy.

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## **10. Contact**

If you have questions, concerns, or requests relating to this Privacy Policy, please contact us at:

**Email:** team@minara.ai