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# PRIVACY POLICY

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Effective January 1, 2026, PHCE-Platform (“PHCE”) and its subsidiaries (collectively, the “PHCE Group,” “we,” “us,” or “our”) updated our Privacy Policy (“Policy”).

## Introduction

This Policy describes our commitment to protecting the privacy of individuals who visit our websites (as defined below) (“Website Visitors”), who register to use our services, or who attend or register to attend sponsored events or other events at which the PHCE Group participates (“Attendees”).

For the purposes of this Policy, the term “Websites” refers collectively to [www.phce-platform.com](http://www.phce-platform.com) and any other websites that the PHCE Group operates and that link to this Policy.

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## SCOPE OF THIS POLICY

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In addition to the Websites that link to this Policy, this Policy applies to the following:

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### TOKENSTOCK.AI MARKETPLACE

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The Tokenstock.ai Marketplace provides donation-based funding and payment services used in conjunction with some of our services. The PHCE Group and third parties may post applications to the PHCE Marketplace. When we post an application and that application links to this Policy, this Policy applies. When a third party posts an application, the privacy policy of that third party applies.

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### PHCE-CUSTOMER PORTAL

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The PHCE-customer Portal enables ONCHAINID Members to create TOSO Tokenized Security WhiteWallet accounts and to access other integrations with our services.

For the purposes of this Policy, “Subscriber” refers to any individual or entity that has entered into a Service Agreement for the use of our services.

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## DEFINITION OF PERSONAL INFORMATION

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In this Policy, “personal information” means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to that person’s physical, physiological, mental, economic, cultural, or social identity.

The use of personal information collected through our services is limited to the purpose of providing the services for which the Subscriber has engaged us.

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## THIRD-PARTY WEBSITES

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Our Websites may contain links to other websites. The information practices and content of such other websites are governed by the privacy statements of those websites. We encourage you to review the privacy statements of any other websites you visit to understand their information practices.

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## RELATIONSHIP TO OUR SERVICES AND SERVICE AGREEMENTS

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Except for Account Information (as defined below) and other information that we collect in connection with your registration for, or authentication into, our services, this Policy does not apply to our security and privacy practices related to your access to and use of the products and services that we offer on a subscription basis through our Websites (our “Services”).

These separate security and privacy practices—including how we protect, collect, and use electronic data, text, messages, communications, or other materials submitted to and stored within the Services by you (“Service Data”)—are detailed in and governed by our Master Subscription Agreement (available separately) or such other applicable agreement between you and any member of the PHCE Group relating to your access to and use of the Services (each a “Service Agreement”).

## SUBSCRIBER RESPONSIBILITIES

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Subscribers to our Services are solely responsible for:

- establishing policies for, and ensuring compliance with, all applicable laws and regulations; and
- complying with any and all privacy policies, agreements, or other obligations related to the collection of personal information in connection with the use of our Services by individuals with whom our Subscribers interact.

If you are an individual who interacts with a Subscriber using our Services, you should contact that Subscriber directly for assistance with any requests or questions relating to your personal information.

## DATA PROCESSED ON BEHALF OF SUBSCRIBERS

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We collect information under the direction of our Subscribers and have no direct relationship with the individuals whose personal information we process in connection with the use of our Services.

If you are an individual who interacts with a Subscriber using our Services (for example, a customer of one of our Subscribers) and you would no longer like to be contacted by that Subscriber, please contact the Subscriber you interact with directly.

We may transfer personal information to companies that help us provide our Services. Transfers to subsequent third parties for these purposes are governed by the Service Agreements with our Subscribers.

## INFORMATION THAT YOU PROVIDE TO US

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### ACCOUNT AND REGISTRATION INFORMATION:

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We ask for and collect personal information about you, such as your name, address, phone number, email address, instant messaging ID, and credit card information, as well as certain related information such as your company name and website name, when you register for an account to access or use one or

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more of our Services (an “Account”). We also ask for and collect personal information, such as an email address and a name or alias, for any individual whom you authorize to log in to and use our Services in connection with your Account.

If you sign up for a free trial Account, you are not required to enter your credit card information unless and until you decide to continue with a paid subscription to our Services. We use a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain, or use your billing information for any purpose other than credit card processing on our behalf.

We refer to any information described above as “Account Information” for the purposes of this Policy. By voluntarily providing us with Account Information, you represent that you are the owner of such personal data or are otherwise authorized to provide it to us.