

ADOT.MAISON – PRIVACY POLICY

Effective Date: 14th July 2026

Last Updated: 14th July 2026

This Privacy Policy (“**Policy**”) explains how VUCA DIGITAL LIMITED, a company incorporated under the laws of the British Virgin Islands, operating the platform and brand “Adot.maison” (“**Adot**”, “**we**”, “**us**”, or “**our**”), collects, uses, discloses, and protects your personal data when you visit or use our website, products, services, and related features (collectively, the “**Services**”).

This Policy is issued in accordance with the Personal Data Protection Act B.E. 2562 (2019) of Thailand (the “**PDPA**”) and, where applicable, other data protection laws that may apply to you.

By accessing or using the Services, you acknowledge that you have read and understood this Policy. Where the PDPA requires your consent for a particular processing activity, we will obtain such consent separately and this acknowledgement alone does not constitute your consent. If you do not agree with this Policy, please do not use the Services.

1. Who We Are and How to Contact Us

Data Controller: VUCA DIGITAL LIMITED, a company incorporated under the laws of the British Virgin Islands, with its registered office at Kingston Chambers, PO Box 173, Road Town, Tortola, British Virgin Islands.

Representative in Thailand: Vuca Digital Co., Ltd., 101 True Digital Park, Building 4th Floor, Room 408, Sukhumvit Road, Bang Chak Sub-district, Phra Khanong District, Bangkok, Thailand. Vuca Digital Co., Ltd. has been designated as our representative in Thailand under the PDPA to act on our behalf in relation to the processing of personal data and to receive communications from data subjects and the competent authority.

Contact / Data Protection Enquiries: info@vucadigital.co

We have designated the above email address as the contact point for all personal data enquiries and for the exercise of your rights under this Policy.

2. Personal Data We Collect

We collect personal data in the following ways:

2.1 Information you provide directly. Depending on how you use Adot, this may include:

- Name or display name;
- Email address;
- Account profile information;
- Messages you send to our support team;
- Content you submit through forms or interactive features; and
- Preferences and consent choices (e.g., cookie and marketing opt-in).

2.2 Wallet and blockchain-related information. If you connect a digital wallet or interact with blockchain features, we may collect:

- Public wallet address;
- Blockchain transaction hashes (public record);
- Token ownership and metadata (public record); and
- On-chain activity that relates to Adot features (public record).

Please note that we do not control blockchain networks. Data recorded on a public blockchain may be public, permanent, and cannot be altered or erased by us.

2.3 Information collected automatically. When you use the Services, we may automatically collect certain technical information, such as:

- IP address;

- Device type and browser type;
- Operating system;
- Referring and exit pages;
- Pages viewed and interactions (e.g., clicks, scrolls);
- Approximate location (derived from IP address); and
- Cookies or similar tracking technologies (where permitted).

2.4 Sensitive personal data. We do not intend to collect sensitive personal data (as defined under the PDPA, such as data revealing race, religion, health, or biometric data) in the ordinary course of providing the Services. If, for the purpose of identity verification, anti-money laundering, or “know-your-customer” (KYC) obligations, we are required to collect data that may be treated as sensitive (for example, information from a national ID card or passport), we will do so only where permitted by law and, where required, with your explicit consent. You should not submit sensitive personal data to us unless we specifically request it.

3. Purposes for Which We Use Personal Data

We process personal data for the following purposes:

- To provide, operate, and maintain the Services;
- To enable purchases, redemptions, delivery of products, and related transactions;
- To improve, personalize, and optimize the Services;
- To communicate with you, including responding to enquiries and providing support;
- To send marketing communications, where permitted by law and subject to your consent where required;
- To detect, prevent, and investigate fraud, abuse, and security incidents; and
- To comply with applicable laws, regulations, and lawful requests from authorities.

4. Legal Bases for Processing

Under the PDPA, we rely on one or more of the following legal bases when processing your personal data:

- **Contractual necessity:** to perform our obligations under, or take steps at your request prior to entering into, a contract with you;
- **Legitimate interests:** to pursue our legitimate interests, such as securing and improving the Services and preventing fraud, provided these are not overridden by your fundamental rights;
- **Legal obligation:** to comply with a legal obligation to which we are subject, such as tax, accounting, and regulatory requirements;
- **Consent:** for optional cookies, marketing communications, certain tracking technologies, and any processing of sensitive personal data, we rely on your consent, which you may withdraw at any time; and
- **Other legal bases:** where applicable, vital interests, public interest, or other bases permitted under the PDPA.

Withdrawing consent does not affect the lawfulness of processing carried out before the withdrawal. Please see the section “Your Rights as a Data Subject” below for how to withdraw consent.

5. Third-Party Service Providers

We may engage trusted third-party vendors (acting as our data processors) to operate and improve the Services. These third parties may process personal data on our behalf and under our instructions. The categories of such service providers include:

- Authentication and wallet connection;
- Analytics and performance monitoring;
- Advertising and social media pixels;

- Hosting, content delivery networks (CDN), and infrastructure; and
- Communications.

We require our processors to implement appropriate security measures and to process personal data only as necessary to provide their services to us. Certain third parties may also process your data as separate data controllers under their own privacy policies, and we encourage you to review them.

6. Cookies and Tracking Technologies

We use cookies and similar technologies (e.g., pixels and SDKs) to:

- Keep you logged in and maintain secure sessions;
- Remember your preferences;
- Measure and analyze usage of the Services; and
- Support marketing and attribution, where enabled.

The types of cookies we use include **strictly necessary cookies** (required for core functions), **analytics cookies** (to help improve performance), and **marketing cookies** (used for ad measurement and retargeting). Non-essential cookies are used only with your consent where required by law.

You can manage cookies through our cookie banner (where available), your browser settings (to block or delete cookies), and any opt-out tools provided by third parties. Some features of the Services may not function correctly if cookies are disabled.

7. Disclosure of Personal Data

We do not sell your personal data. We may disclose personal data in the following circumstances:

- **Affiliates and group companies:** to other companies within the same corporate group as us (including between VUCA DIGITAL LIMITED and Vuca Digital Co., Ltd.), for purposes consistent with this Policy, such as operating, supporting, and administering the Services.
- **Service providers:** to processors who perform services on our behalf;
- **Legal and compliance:** where necessary to comply with applicable law, legal process, or lawful requests from government or regulatory authorities;
- **Business transfers:** in connection with a merger, acquisition, financing, reorganization, or sale of assets, subject to appropriate confidentiality protections; and
- **With your consent:** for any other disclosure that you have consented to.

8. Your Rights as a Data Subject

Subject to the conditions and exceptions under the PDPA, you have the following rights in relation to your personal data:

- **Right of access:** to access and obtain a copy of your personal data;
- **Right to data portability:** to receive or have transferred your personal data in a machine-readable format, where applicable;
- **Right to object:** to object to certain processing, including direct marketing;
- **Right to erasure:** to request deletion or anonymization of your personal data, where applicable;
- **Right to restriction:** to request suspension of the use of your personal data;
- **Right to rectification:** to request correction of inaccurate, outdated, incomplete, or misleading data;
- **Right to withdraw consent:** to withdraw consent at any time where processing is based on consent.

To exercise any of these rights, please contact us at info@vucadigital.co. We may request information to verify your identity before fulfilling your request. We will respond within the timeframe required by the PDPA. Please note that certain data recorded on public blockchains cannot be altered or erased by us.

9. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to:

- Provide the Services;
- Comply with legal, tax, and accounting requirements;
- Resolve disputes;
- Enforce our agreements; and
- Maintain security and prevent fraud.

Retention periods may vary depending on the type of data and the purpose of processing. When personal data is no longer required, we will delete, destroy, or anonymize it in accordance with the PDPA.

10. Security

We implement reasonable administrative, technical, and physical safeguards designed to protect personal data against unauthorized or unlawful access, loss, or disclosure, including:

- Encryption in transit (HTTPS);
- Access control and least-privilege systems;
- Monitoring and security practices; and
- Vendor risk management.

However, no method of transmission over the internet or method of electronic storage is completely secure, and we cannot guarantee absolute security.

11. Children's Privacy

The Services are not intended for minors. Under the PDPA, where the data subject is a minor (a person under twenty (20) years of age who is not sui juris through marriage or otherwise), consent for processing must be obtained from the holder of parental responsibility over the minor, in accordance with the PDPA. We do not knowingly collect personal data from minors without such consent. If you believe that a minor has provided us with personal data without appropriate consent, please contact us so that we can take appropriate action, including deletion.

12. Changes to This Privacy Policy

We may update this Policy from time to time. If we make material changes, we will update the “Last Updated” date above and may notify you through the Services or by other appropriate means. Your continued use of the Services after the changes take effect constitutes your acknowledgement of the updated Policy, provided that, where the PDPA requires fresh consent for new processing activities, we will obtain such consent separately.

13. Contact Us

If you have any questions, concerns, or requests regarding this Policy or your personal data, please contact us:

Company: VUCA Digital Limited

Address: 101 True Digital Park, Building 4th Floor, Room 408, Sukhumvit Road, Bang Chak Sub-district, Phra Khanong District, Bangkok, Thailand.

Email: info@vucadigital.co