

Privacy Policy

Last updated on November 4, 2025

This Privacy Policy (“Policy”) for BasisX (“Company”, “we”, “our”, or “us”) describes the basis on which we may process personal data we may collect from users of the Company’s website and interface (“Interface”), in accordance with applicable law. For purposes of applicable data protection laws, the Company is the controller. For the purposes of this Policy, “you” and “your” refers to you as the user of the Interface.

Read this Policy carefully so that you understand your rights in relation to your personal data and how we might collect, use, and process it. If you do not agree to this Policy, do not use, access, connect to or interact with the Interface, or otherwise provide your information to us.

PERSONAL DATA WE COLLECT ABOUT YOU, WHY WE PROCESS IT, AND THE LEGAL BASIS FOR PROCESSING

When you access, use, connect to, or interact with the Interface, we may collect certain categories of information about you, including personal data, from a variety of sources.

Information you provide to us:

Data may include: (i) any digital-asset, smart-contract, or protocol address (“Wallet”) information; and (ii) geolocation data. You provide this data to us when you connect your Wallet to the Interface.

Other data may include transaction data or history (such as your public blockchain transaction history and other information associated with a linked address or Wallet, token holdings, funding rate positions, and vault participation). Should you contact us, we will collect the content of the communications we have with you and any personal data contained within, including the email address you used to contact us.

Information we collect automatically:

When you visit certain pages on our Interface, our servers save each access in a log file. The following data may be collected: (i) the date and time of access; (ii) the country from which the Interface is accessed; (iii) any API endpoints being accessed; (iv) user agent details; (v) the operating system of your computer and the browser you are using (provider, version, and language); and (vi) the transmission protocol used (e.g., HTTP/1.1).

Finally, we may use web beacons/clear gifs, geolocation and tracking technologies, and other applications when you visit the Interface, including technolo-

gies collecting certain information about your access to, use of, connection to, or interaction with the Interface (“Usage Data”) that may be integrated with third-party service providers.

In our legitimate interests to provide effective services to you, we may also use this data to create aggregated, anonymized, or de-identified data.

Third-Party Wallet Connections and Disclaimer:

Certain features of the Interface require you to connect a compatible third-party digital Wallet. By using such Wallet, you agree that your access to, use of, connection to, and/or interactions with such third-party Wallets are governed by the policy for the applicable Wallet, and you agree that you are using the Wallet in accordance with the terms and conditions of the applicable third-party provider of such Wallet.

Wallets are not maintained or supported by, or associated or affiliated with, the Company. We expressly disclaim any and all liability for actions arising from your use of third-party Wallets, including but without limitation, actions relating to the use and/or disclosure of personal information by such third-party Wallets.

Legal Basis for Processing Personal Data:

We generally process the information we collect when we need to do so to perform our contract with you. For example, the processing of this data is carried out for the purpose of enabling your access to, use of, connection to, and interaction with the Interface, including: (i) to facilitate your connection to the Interface; (ii) to provide funding-rate perp trading, vault management, and yield product functionality; and (iii) to identify if you are likely to be a Restricted Person, as defined in our general Terms of Use. Each case with respect to any of (i), (ii), or (iii) is in order for us to perform our contract with you and in our legitimate interests to provide access to the Interface to you.

With your consent, we may use any data collected, including Usage Data, to tailor features and content to you and to ensure content is presented in the most effective manner for you and your device. We may also use and run analytics to better understand your user experience with respect to the Interface, including analysis of funding-rate trading patterns, vault performance, and yield optimization strategies.

We may also process this data in our legitimate interests to assist system security and stability for provision of the Interface, to conduct troubleshooting, data analytics, testing, and research, and to enable optimization and internal statistical analysis with respect to the Interface, as well as to maintain the safety and security of our users, the Interface, and to improve and develop the Interface.

In addition to the foregoing, we may use any of your information to comply with any applicable legal obligations, to enforce any applicable terms of use, and to

protect or defend the Interface, our rights, and the rights of our users or others.

Cookie Policy:

We use cookies to enhance your experience when accessing and using the Interface. The cookies we use are strictly necessary cookies, which help ensure compliance with our Terms of Use, and are otherwise integral to our ability to provide the best user experience and to help us understand general usage patterns. These cookies are not used for marketing purposes. By continuing to use the Interface, you consent to the placement of these cookies.

YOUR RIGHTS

Under applicable data protection laws, you may have certain rights in relation to your personal data. These rights may include the following:

- Access to your personal data that we hold, information on how we use it, and who we share it with;
- Request the correction of inaccurate or incomplete personal data we hold about you, which we may verify as necessary before making changes;
- Deletion or removal of your personal data, in certain circumstances;
- Objection to the processing of your personal data, in certain circumstances;
- Restriction of the processing of your personal data, to stop us from processing the personal data we hold about you other than for storage purposes, in certain circumstances;
- Portability of your personal data; we will endeavor to provide you, or a third party, with a copy of the personal data that we hold about you and transfer it to a third party in a structured, commonly used, machine-readable format;
- Withdrawal of consent, where we rely on consent to process personal data; this will not affect the processing of personal data carried out before consent is withdrawn or on legal bases other than consent.

You may submit a written request concerning the processing of your personal data to support@thebasis.fi. Please note that, prior to any response to such request, we will require you to verify your identity. In addition, we may have valid legal reasons to refuse your request and will inform you if that is the case.

Note that these rights apply only in certain circumstances and all of these rights may be limited by law. Such limitations may apply, for example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests, or where we are required by law to retain your personal data.

To the extent required under applicable data protection laws, we will be responsive to your request without undue delay and where required under applicable

data protection laws, at least within one month (though this may be extended by a further two months in certain circumstances).

SHARING OF PERSONAL DATA

In certain circumstances, we may share your information with third parties with your consent, as necessary, or as otherwise required or permitted by law, including, but not limited to:

Service providers and vendors: We may share your personal data with third parties to process on our behalf. Such third parties could include blockchain analysis service providers, screening service providers, developers, content delivery service providers, data analytics service providers, and oracle service providers. Such service providers may assist us with many different functions and tasks, including geo-blocking based on IP address and collecting anonymized device information for analytics purposes related to funding-rate trading and vault performance.

Professional advisors, in our legitimate interests or as required by law.

For legal and security reasons and to protect our Interface, in our legitimate interests or as required by law.

Your personal information may be transferred to and stored or processed in countries outside the jurisdiction in which you live and reside, including outside the European Economic Area (“EEA”) and United Kingdom (“UK”), and including to the United States of America, in order to provide the Interface. Your personal information may also be processed by staff operating outside the UK/EEA who work for us or for third-party service providers or partners. We will take steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy. Should we transfer your personal information to third parties located outside the EEA/UK, we will seek to put in place appropriate safeguards to ensure that this transfer occurs in accordance with applicable laws. These measures include seeking entry into the standard contractual clauses (“SCCs”) approved by the European Commission (for transfers outside the EEA) and/or an international data transfer agreement/addendum to the SCCs approved by the UK Information Commissioner’s Office (“ICO”) (for transfers outside the UK), unless the data transfer is to a country that has been determined by the European Commission or the relevant UK authorities, as applicable, to provide an adequate level of protection for individuals’ rights and freedoms for their personal data.

RETENTION

We will retain your personal data only for so long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements, or as otherwise required by law.

The length of time we retain your data will depend on the nature of the data and the purpose for which it was processed.

CHILDRENS’ PRIVACY AND DATA PROTECTION

If we become aware that we have unknowingly collected information about any person under eighteen (18) years of age, we will make commercially reasonable efforts to delete such personal data and other information from our records.

SECURITY MEASURES TAKEN TO PROTECT PERSONAL DATA

Be aware that despite our efforts to protect your personal data and other information, we cannot guarantee perfect security of your information transmitted through the Interface. In addition, note that any information you send to us electronically, may not be secure while in transit. Any transmission is at your own risk.

USAGE DATA COLLECTION

When you access, use, connect to, or interact with the Interface, the Company and any of its third-party service providers may receive and record personal data that you may have provided and your digital signature.

SOCIAL MEDIA AND OTHER THIRD-PARTY WEBSITES AND LINKS

We may provide links on the Interface to other websites or online platforms operated by third parties, including social media or content platforms operated by third parties, such as X (formerly Twitter) or Medium (such platforms, generally, “Social Media Platforms”). We may also provide links to websites or online platforms operated by third-party contributors to the Hyperliquid blockchain and ecosystem (“Contributors”). We do not own, operate, or control such third-party websites. If you follow links to sites not owned or operated by us, you should review their available privacy and security policies and other terms and conditions. We do not guarantee and are not responsible for the privacy, security, or content of these sites, including the accuracy, completeness, or reliability of information and services found on these sites.

Note that third parties and Contributors may provide services, information, dashboards, websites, tools, functionalities, and applications, and these may be linked from time to time through the Interface or through Social Media Platforms. Such third parties and Contributors are independent and as such, we do not own, operate, or control their services, information, dashboards, websites, tools, functionalities, and applications and cannot guarantee, and are not responsible for, the privacy, security, or content of these sites or the accuracy,

completeness, or reliability of services, information, dashboards, websites, tools, functionalities, and applications found on these sites. Our inclusion of links, including through Social Media Platforms, does not, by itself, imply any endorsement of such services, information, dashboards, websites, tools, functionalities, and applications, or of their owners, operators, or publishers, except as disclosed on the Interface.

When you open a link to any Social Media Platform from the Interface, a direct connection may be established between your browser and the server of the Social Media Platform. This provides the Social Media Platform with information that you visited the Interface and accessed the link. If you access a link to a Social Media Platform while logged-in to your account on the Social Media Platform concerned, the content of the Interface may be linked to your profile on the platform (i.e., the Social Media Platform may link your visit to the Interface directly to your user account). If you want to prevent this, you should log out before clicking on the relevant links. In any case, an association takes place when you log-in to the relevant Social Media Platform after clicking on the link.

PERIODIC REVIEWS AND UPDATES TO POLICY

This Policy takes into account the requirements of Panama’s Law No. 81 of 2019 on Personal Data Protection (Ley No. 81 de Protección de Datos Personales) and general privacy principles. Individuals located in the European Union (“EU”) and the United Kingdom (“UK”) may have rights under the EU General Data Protection Regulation 2016/679 and the UK General Data Protection Regulation, respectively (collectively, the “GDPR”). Note that you can file a claim with the data protection supervisory authority in the EEA country in which you live or work or where you think we have infringed data protection laws, or with the UK Information Commissioner’s Office, as applicable to you. Other applicable global privacy and data-protection laws may provide you rights with respect to your personal data and other information.

We may review and update this Policy from time to time. Updates to this Policy will apply only to information collected after the date of the change. If we make material changes, we will update the “Last updated” date at the top of this Policy.

CONTACT

Should you have any questions or complaints about our privacy or data-protection practices, your personal data, or this Policy, you can email us at support@thebasis.fi.