

Privacy Policy

Last updated: August 21, 2026

oddeon.xyz

SUMMARY OF KEY POINTS

Oddeon collects the information needed to operate a non-custodial order routing service: account and verification data, wallet addresses, order and transaction records, and standard device and usage data. We do not sell your personal information. We share data with Venues, infrastructure providers, and service providers only as needed to route your orders and run the Service, and with regulators or authorities where the law requires it. Because order execution happens on public blockchains, wallet addresses and transaction details tied to your activity are inherently visible on-chain, independent of anything Oddeon does. Depending on where you live, you may have rights to access, correct, or delete your personal information, described in Section 9. This summary is for convenience only and does not replace the full Policy below.

This Privacy Policy describes how Oddeon Inc., a Delaware corporation ("Oddeon," "we," "us," or "our"), collects, uses, discloses, and protects information in connection with the Oddeon platform, including the website at oddeon.xyz, associated applications, APIs, and related services (together, the "Service"). This Policy is incorporated into and should be read alongside our Terms of Service. Capitalized terms not defined here have the meaning given in the Terms.

1 Scope of This Policy

This Policy applies to personal information we collect through the Service. It does not apply to information collected by third-party Venues, wallet infrastructure providers, blockchain networks, or other services you access through or alongside Oddeon. Each of those operates under its own privacy practices, which we encourage you to review separately. Section 6 describes how information moves between Oddeon and these third parties.

2 Information We Collect

We collect information in three ways: what you give us directly, what we collect automatically as you use the Service, and what we receive from third parties involved in operating the Service.

CATEGORY	EXAMPLES	SOURCE
Account and identity data	Email address, authentication identifiers, and, where verification is required for certain features, identity documents and verification results	Provided by you; verification results from our identity verification provider
Wallet and transaction data	Wallet addresses, order history, routing decisions, execution prices, position and portfolio data, on-chain transaction records	Generated by your use of the Service and by the Venues and blockchains your orders touch
Device and usage data	IP address, browser and device type, operating system, pages viewed, session timing, referring URLs, general location inferred from IP	Collected automatically through cookies, SDKs, and server logs
Communications	Support requests, correspondence with us, survey responses, feedback	Provided by you

On-chain data. Orders you route through the Service settle on public blockchains. Wallet addresses, transaction amounts, and transaction history associated with those settlements are recorded on public, permissionless ledgers that anyone can view, independent of Oddeon. We do not control and cannot remove data from a public blockchain.

3 How We Use Information

We use the information described in Section 2 to:

- provide, operate, and maintain the Service, including routing orders, displaying prices and portfolio data, and processing transactions;
- verify identity and eligibility where required, and screen for sanctions, fraud, and prohibited conduct under our Terms;
- maintain the security and integrity of the Service, including detecting and preventing abuse, unauthorized access, and manipulation;
- communicate with you about your account, transactions, security alerts, and changes to the Service or this Policy;
- analyze and improve the Service, including understanding usage patterns and diagnosing technical issues; and
- comply with legal obligations, respond to lawful requests from authorities, and enforce our Terms.

We do not use your information to make automated decisions that produce legal or similarly significant effects about you without human involvement.

4 Legal Bases for Processing (EEA, UK, and Similar Jurisdictions)

Where applicable data protection law requires a legal basis for processing, we rely on the following: performance of a contract with you (operating the Service you signed up for), our legitimate interests (securing the Service, preventing fraud, and improving our product, balanced against your rights), compliance with a legal obligation (sanctions screening, tax and recordkeeping requirements, responding to lawful requests), and, where applicable, your consent (certain cookies and marketing communications, which you may withdraw at any time).

5 Cookies and Similar Technologies

We use cookies and similar technologies to keep you signed in, remember preferences, understand how the Service is used, and measure performance. Some cookies are strictly necessary for the Service to function and cannot be disabled without affecting core functionality. Others, such as analytics cookies, are optional. Where required by law, we present a cookie banner allowing you to accept or decline non-essential cookies before they are set. You can also control cookies through your browser settings, though disabling certain cookies may limit parts of the Service.

6 How We Share Information

We do not sell your personal information. We disclose it only in the following circumstances:

- **Venues.** When you place an order, the wallet address, order size, and routing details needed to execute that order are shared with the relevant Venue or Venues. This is necessary to route and settle your trade.
- **Infrastructure and service providers.** We share information with providers who perform services on our behalf, including our authentication and wallet infrastructure provider, cloud hosting, analytics, customer support tooling, and identity verification. These providers are authorized to use your information only to provide services to us and are bound by contractual confidentiality and data protection obligations.
- **Legal and safety.** We may disclose information where required by law, regulation, subpoena, or other legal process, or where we believe in good faith that disclosure is necessary to prevent fraud, protect the security of the Service, or protect the rights, property, or safety of Oddeon, our users, or others.
- **Business transfers.** If Oddeon is involved in a merger, acquisition, financing, or sale of assets, information may be transferred as part of that transaction, subject to standard confidentiality protections.
- **With your direction.** We may share information with third parties when you direct us to, such as connecting a third-party service to your account.

We require service providers and Venues we integrate with to handle your information consistent with this Policy and applicable law, though each Venue's own privacy practices govern data it holds independently once your order reaches it.

7 International Data Transfers

Oddeon and the providers we work with operate in multiple countries. Your information may be transferred to, stored, and processed in a country other than the one where you live, including the United States, which may have data protection laws different from those in your jurisdiction. Where we transfer personal information out of the EEA, UK, or Switzerland, we rely on recognized transfer mechanisms, such as Standard Contractual Clauses, to protect that information.

8 Data Retention

We retain personal information for as long as needed to provide the Service, comply with legal, tax, and recordkeeping obligations, resolve disputes, and enforce our agreements. Retention periods vary by data type. Account and transaction records are generally retained for the period required by applicable financial recordkeeping and anti-money-laundering obligations, even after an account is closed. Device and usage data tied to an identifiable individual is generally retained for a shorter period unless needed for security or legal purposes. Information recorded on a public blockchain persists independently of our retention practices, as described in Section 2.

9 Your Rights and Choices

Depending on where you live, you may have some or all of the following rights regarding your personal information: to access the personal information we hold about you; to correct inaccurate or incomplete information; to request deletion of your information, subject to our legal and recordkeeping obligations; to object to or restrict certain processing; to receive a portable copy of information you provided to us; and to withdraw consent where processing is based on consent, without affecting processing that occurred before withdrawal.

California residents have rights under the California Consumer Privacy Act, as amended, including the right to know, delete, and correct personal information, and the right to opt out of the sale or sharing of personal information. We do not sell or share personal information for cross-context behavioral advertising as those terms are defined under California law.

To exercise any of these rights, contact us using the details in Section 13. We will verify your request and respond within the timeframe required by applicable law. Some information, particularly transaction records required for legal compliance and data recorded on public blockchains, cannot be deleted even upon request.

10 Security

We use administrative, technical, and organizational measures designed to protect personal information against unauthorized access, loss, misuse, or alteration, including encryption in transit, access controls, and secure key management practices maintained by our wallet infrastructure provider. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. You are responsible for safeguarding your own login credentials and any wallet credentials or private keys you control, as described in our Terms of Service.

11 Children's Privacy

The Service is not directed to individuals under 18, and we do not knowingly collect personal information from anyone under 18. If we learn that we have collected personal information from someone under 18, we will take steps to delete it. If you believe a child has provided us with personal information, contact us using the details in Section 13.

12 Changes to This Policy

We may update this Policy from time to time to reflect changes to the Service or our practices. If we make material changes, we will provide notice through the Service or by other reasonable means, and the updated Policy will state its effective date. Your continued use of the Service after the effective date constitutes acceptance of the updated Policy.

13 Contact Us

Questions about this Policy, requests to exercise the rights described in Section 9, and general questions about our Terms of Service can be sent to legal@oddeon.xyz.