

Privacy Policy — BoBe.app

Version 2.0

Controller: SOFTERE LLC, Republic of Armenia, registration number 53639461
Platform: <https://bobe.app> · **Privacy and legal inquiries:** legal@bobe.app · **Support:** support@bobe.app
Version: 2.0 · **Effective date:** 15 October 2026 · Replaces the Privacy Policy dated 19 March 2025

1. Scope

- 1.1. This Privacy Policy explains how SOFTERE LLC (the “Operator”, “we”) processes personal data of Users of the Platform and of Partners in the Affiliate Program. Capitalised terms have the meaning given in Section 1 of the Terms of Use.
- 1.2. This Policy forms part of the Terms of Use and of the Partner Agreement. In matters of personal data, this Policy prevails.
- 1.3. This Policy does not cover third-party services you use with the Platform (wallets, exchanges, block explorers, fiat on-ramps). Their own privacy policies apply.

2. Data We Process

Category	Examples	Source
Wallet and on-chain data	Public wallet address, Baking, Unbaking, Swap and Cashback transactions	Your wallet; BNB Smart Chain
Technical data	IP address, device and browser type, operating system, language, session identifiers, timestamps, pages and features used	Your device; cookies
Affiliate Program data	Referral identifier, referring Partner, Structure, Partner Level, Partner Reward accruals, acceptance records (date and time, document version, wallet, IP, session)	Platform records
Contact data	Email address, Telegram or other handle, message content	You, when you contact us or register as a Partner
Compliance data	Identity documents, proof of address, source-of-funds information, sanctions and PEP screening results	You and screening providers, only when requested under Section 3.6 of the Terms of Use or Section 8 of the Partner Agreement

We do not collect private keys or seed phrases and never ask for them.

3. Purposes and Legal Bases

Purpose	Legal basis
Providing the Platform: wallet connection, Swap, Baking, Cashback, statistics	Performance of the Terms of Use
Running the Affiliate Program: attribution, qualification, Partner Rewards, acceptance records	Performance of the Partner Agreement
Security, fraud and abuse prevention, geo-restriction of Restricted Jurisdictions	Legitimate interests; legal obligations
AML/KYC, sanctions and PEP screening	Legal obligations; legitimate interests
Support and responding to inquiries	Performance of contract; legitimate interests
Aggregated analytics and Platform improvement	Legitimate interests; consent where required for non-essential cookies
Service and legal notices	Performance of contract; legal obligations

We do not use personal data for automated decisions that produce legal effects, other than automatic calculation of Cashback and Partner Rewards from on-chain data under the Terms of Use and the Partner Agreement.

4. Public Blockchain Data

Transactions on BNB Smart Chain are public, permanent and visible to anyone. We cannot modify or delete on-chain data. Linking your wallet address to your identity (for example, through KYC or contact with us) makes your on-chain activity attributable to you. You can limit this by using separate wallets.

5. Sharing

5.1. We do not sell or rent personal data.

5.2. We share personal data only with: hosting, infrastructure, analytics and security providers acting on our instructions; KYC and sanctions screening providers; professional advisers; authorities where required by law or court order; and a successor in a merger, acquisition or reorganisation.

5.3. Within the Affiliate Program, a Partner sees aggregated statistics of their Structure (for example, number of Active Referrals, Team Volume and Partner Reward accruals) and, where shown in the dashboard, truncated wallet addresses of their Referrals. We do not disclose Referrals' contact or compliance data to Partners.

5.4. A Partner who independently collects personal data of people they introduce acts as an independent controller of that data and is responsible for its lawful processing.

6. International Transfers

The Operator is established in the Republic of Armenia, and our providers may process data in other countries. Where data of Users in the European Economic Area, the United Kingdom or Switzerland is transferred to a country without an adequacy decision, we use appropriate

safeguards such as Standard Contractual Clauses. You can request information about these safeguards at legal@bobe.app.

7. Retention

Data	Retention period
Technical logs	Up to 12 months, longer only for security investigations
Affiliate Program records and acceptance records	Duration of participation plus 5 years
Compliance (KYC/AML) data	5 years after the end of the relationship, or longer if required by law
Support correspondence	Up to 3 years after the last contact
On-chain data	Permanent on the blockchain; outside our control

8. Cookies

8.1. We use strictly necessary cookies (session, security, language) and, with your consent where required, analytics cookies.

8.2. You can manage cookies in your browser and through the cookie banner where shown. Disabling non-essential cookies does not prevent use of the core Platform functions.

9. Your Rights

9.1. Depending on your jurisdiction, you may have the right to access, rectify, erase, restrict or object to processing of your personal data, to data portability, and to withdraw consent at any time.

9.2. Send requests to legal@bobe.app. We respond within thirty (30) days and may ask you to verify control of your wallet or email. We cannot erase on-chain data, and we may retain data we must keep by law.

9.3. You may lodge a complaint with the data protection authority of your country of residence.

10. Security

We apply technical and organisational measures appropriate to the risk, including TLS encryption, access controls and logging. If a personal data breach affects you, we notify you and the competent authorities where required by law. You are responsible for securing your wallet, private keys and devices.

11. Minors

The Platform is not intended for persons under eighteen (18) years of age or the age of majority in their jurisdiction, if higher. We do not knowingly process their data. If you believe a minor has provided data to us, contact legal@bobe.app.

12. Changes

We may update this Policy by publishing a new version with a new effective date. Material changes take effect fourteen (14) days after publication and are announced on the Platform.

13. Contact

SOFTERE LLC, Republic of Armenia, registration number 53639461 · legal@bobe.app · support@bobe.app · <https://bobe.app>