

# VALIGATOR LLC PRIVACY POLICY

Last Updated: March 2, 2026

Valigator LLC (“Valigator,” “we,” “us,” or “our”) values your privacy. This Privacy Policy explains how we collect, use, disclose, and retain personal information when you visit our website(s) or use products and services that link to this Privacy Policy, including our permissionless public validator service (“Valigator Open”) and our private onboarding and validator-related services (collectively, the “Services”).

This Privacy Policy does not replace or modify any separate agreement you may have with Valigator (including any staking/delegation services agreement). If there is a conflict between this Privacy Policy and a separate written agreement governing specific services, that agreement controls for those services.

## Scope of Services

Valigator operates (i) a permissionless public validator service (“Valigator Open”), and (ii) private services that may require onboarding, account creation, identity verification, and payout processing (the “Private Services”).

This Privacy Policy applies to personal information collected in connection with the Private Services and our website. Because Valigator Open is permissionless and does not require user accounts or direct submission of personal information, our data collection practices differ as described below.

## 1) Key Points

- We collect information you provide in connection with the Private Services, information collected automatically through our website, and information required for KYC/AML/sanctions screening where applicable.
- We use information to provide the Services, process payouts, comply with the law, prevent fraud, and improve the Services.
- We share information with service providers (including compliance screening providers), and with regulators/law enforcement when required.
- Blockchain data is public by nature; we cannot delete information recorded on a public blockchain.

- We do not sell personal information in the traditional sense. We do not “share” personal information for cross-context behavioral advertising unless we explicitly say so.

## 2) Information We Collect

### A) Information you provide to us

We collect the following information **in connection with the Private Services**, where applicable:

- Contact information (name, email address, phone number)
- Account and profile information (if you create an account)
- Identity verification and compliance information (may include date of birth, address, government ID, tax forms such as W-9/W-8, entity formation documents, beneficial ownership information, and other information necessary to verify identity and eligibility for payouts)
- Payout information (bank account details if applicable; wallet addresses for payouts; payout preferences)
- Communications (messages you send to us, support tickets, and related records)

### B) Information we collect automatically

When you use the website or Private Services, we may automatically collect:

- Device and usage information (IP address, device identifiers, browser type, operating system, pages viewed, links clicked, timestamps, referring URL, and similar data)
- Cookies and tracking technologies (see Section 6)

### C) Blockchain-related information

**Private Services / hosted infrastructure.** If you provide wallet addresses in connection with the **Private Services**, or you interact with supported networks through **our hosted infrastructure** (e.g., dashboards, APIs, or other hosted endpoints), we may collect and analyze blockchain-related information associated with your activity, such as:

- Public wallet addresses
- Transaction hashes/IDs

- On-chain activity relevant to the Private Services (e.g., staking/delegation activity, payouts, or troubleshooting)
- Network metadata (e.g., timestamps, amounts, token type, and other publicly available blockchain data)

**Valigator Open.** For users interacting solely with **Valigator Open**, Valigator generally receives only publicly available blockchain information and does **not** collect identity verification information unless you separately engage with the Private Services. Valigator Open does not require account creation.

#### **D) Information from third parties**

We may receive information from:

- Compliance and screening providers (KYC/KYB, sanctions screening, and blockchain analytics/KYT)
- Payment processors, banking partners, and payout providers (where applicable)
- Vendors that help us provide the Services (e.g., hosting, analytics, customer support tools)
- Public sources (as necessary to verify identity, prevent fraud, or comply with law)

### **3) How We Use Information**

We use personal information primarily in connection with the Private Services and our website to:

- Provide, maintain, and operate the Private Services and our website.
- Verify identity and eligibility to use the Services or receive payouts (KYC/KYB)
- Comply with AML/sanctions obligations, conduct screening, and monitor for suspicious activity
- Process payouts and related operational functions
- Provide customer support, respond to inquiries, and communicate about the Services
- Improve and secure the Services (debugging, analytics, testing, quality assurance, and preventing security incidents)
- Prevent fraud, abuse, and illegal activity
- Comply with legal obligations and enforce our agreements and policies
- Conduct business operations (audits, reporting, corporate governance, and business continuity)

### **4) How We Share Information**

We do not disclose personal information except as described below.

#### **A) Service providers and vendors**

We may share information with vendors and service providers that perform services on our behalf, such as:

- Hosting and infrastructure providers
- Analytics providers
- Customer support tools
- Identity verification providers (KYC/KYB)
- Sanctions screening providers
- Blockchain analytics / KYT providers
- Payment processing and payout providers (where applicable)

These providers are authorized to use personal information only as needed to provide services to us and are expected to protect it.

#### **B) Compliance, legal, and safety disclosures**

We may disclose information if we believe in good faith that disclosure is necessary to:

- Comply with applicable law, regulation, legal process, or governmental request
- Respond to lawful requests from public authorities (including to meet national security or law enforcement requirements)
- Investigate, prevent, or address fraud, security, or technical issues
- Protect the rights, property, or safety of Valigator, our users, or others
- Enforce our agreements, policies, and terms

#### **C) Business transfers**

If we are involved in a merger, acquisition, financing, due diligence, reorganization, bankruptcy, or sale of all or a portion of our assets, information may be transferred as part of that transaction, subject to standard confidentiality protections.

#### **D) With your consent / at your direction**

We may share information when you instruct us to do so or provide consent.

#### **5) Retention**

We retain personal information for as long as reasonably necessary to:

- Provide the Services
- Maintain business records

- Resolve disputes
- Enforce agreements
- Comply with legal and regulatory obligations (including recordkeeping obligations applicable to regulated financial services activities, where relevant)

Retention periods vary based on the type of information and the purposes for which it is collected.

## **6) Cookies and Tracking Technologies**

We and our service providers may use cookies, pixels, and similar technologies to:

- Provide core website functionality
- Remember preferences
- Understand usage and improve performance
- Maintain security and prevent fraud

You can typically control cookies through your browser settings. If you disable cookies, parts of the Services may not function as intended.

**Do Not Track:** Some browsers offer “Do Not Track” signals. There is no universal standard for responding, and we do not respond to such signals.

## **7) Security**

We use reasonable administrative, technical, and physical safeguards designed to protect personal information. However, no security measure is perfect, and we cannot guarantee absolute security.

## **8) Your Choices and Rights**

### **A) Updating your information**

You may request to update or correct certain information by contacting us (see Section 12).

### **B) Marketing communications**

If we send marketing emails, you can opt out by using the unsubscribe link in the message. You may still receive non-marketing messages about the Services (e.g., security notices or transactional communications).

### **C) U.S. state privacy rights (where applicable)**

Depending on your state of residence, you may have rights such as:

- Access to personal information we hold about you
- Correction of inaccurate personal information
- Deletion of personal information (subject to exceptions)
- Information about categories of data collected, used, and disclosed
- Opt-out of certain processing (such as targeted advertising, if applicable)

**Sales/Sharing:** We do not sell personal information in exchange for money. We also do not share personal information for cross-context behavioral advertising unless we specifically state otherwise. If our practices change, we will update this policy and provide any required rights mechanisms.

To exercise rights, contact us as described in Section 12. We may need to verify your identity before responding.

## **9) International Users**

If you access the Services from outside the United States, your information may be transferred to and processed in the United States or other jurisdictions where our service providers or we operate. Data protection laws may differ from those in your location.

## **10) Children's Privacy**

The Services are not directed to children under 18, and we do not knowingly collect personal information from individuals under 18. If you believe a minor has provided us with information, contact us, and we will take appropriate steps.

## **11) Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. The "Last Updated" date reflects when the policy was revised. If we make material changes, we will take reasonable steps to provide notice (such as posting a notice on our website or contacting you where appropriate).

## **12) Contact Us**

If you have questions or requests regarding this Privacy Policy or our privacy practices, contact us at:

### **Valigator LLC**

Email: [info@valigator.tech](mailto:info@valigator.tech)

Mailing Address: 357 McCaslin Blvd Ste 200, Louisville, CO 80027