

# PRIVACY POLICY

## FOR TALUS LABS, INC.

**Effective Date: July 3<sup>rd</sup>, 2025**

**Last Updated: July 3<sup>rd</sup>, 2025**

For individuals in the European Economic Area, United Kingdom, and Switzerland, you can read this version of our Privacy Policy specific to your region.

We at Talus Labs, Inc., together with our subsidiaries Rugged Club, LLC and Tallys, LLC (collectively, "Talus," "we," "our," or "us") respect your privacy and are strongly committed to keeping secure any information we obtain from you or about you. This Privacy Policy describes our practices with respect to Personal Data that we collect from or about you when you use our blockchain infrastructure, AI agent platforms, applications, websites, and services (collectively, "Services").

This Privacy Policy applies to all Talus Services, including but not limited to:

- The Talus Network blockchain and Nexus framework
- IDOL.fun Agent vs Agent gaming platform, AI Agent launchpad and tokenization platform
- Talus Vision no-code agent builder
- Rugged.Club interactive dating simulator
- Tallys NFT collection and related services
- Associated websites, mobile applications, and developer tools

This Privacy Policy does not apply to data that we process on behalf of enterprise customers of our developer tools and APIs, or data processed by autonomous AI agents operating independently on our blockchain infrastructure. Our use of enterprise customer data is governed by our customer agreements covering access to and use of those offerings.

For information about how we collect and use data to train and improve our AI models and agents, and your choices with respect to that information, please see our AI Training Data Notice.

### 1. Personal Data We Collect

We collect personal data relating to you ("Personal Data") as follows:

#### Personal Data You Provide

We collect Personal Data if you create an account to use our Services, interact with AI agents, participate in tokenization activities, or communicate with us as follows:

**Account Information:** When you create an account with us, we will collect information associated with your account, including your name, email address, username, contact information, account credentials, date of birth (for age verification), payment information, digital wallet addresses, transaction history, and KYC/AML verification documents where required (collectively, "Account Information").

**AI Interaction Data:** We collect Personal Data from your interactions with AI agents on our platforms, including conversation logs, prompts, agent customization preferences, relationship progression data, character interaction patterns, choice selections in interactive narratives, voice recordings (if applicable), uploaded files or media shared with agents, and feedback or ratings you provide about agent interactions ("AI Interaction Data").

**Blockchain Transaction Data:** We collect information related to your blockchain transactions and activities, including wallet addresses, transaction histories, smart contract interactions, token holdings and transfers, staking activities, governance participation, agent tokenization activities, and DeFi protocol interactions ("Blockchain Data").

**User-Generated Content:** We collect content that you create or contribute to our platforms, including agent character designs, storylines, custom agents, forum posts, community contributions, creative assets, and any other content you upload or share ("User Content").

**Communication Information:** If you communicate with us, such as via email, social media, customer support channels, or community platforms, we may collect Personal Data like your name, contact information, and the contents of the messages you send ("Communication Information").

**Premium Service Data:** We collect information related to premium features and services, including subscription preferences, payment history, premium content access, special feature usage, and billing information ("Premium Data").

## **Personal Data We Receive from Your Use of the Services**

When you visit, use, or interact with the Services, we receive the following information about your visit, use, or interactions ("Technical Information"):

**Log Data:** We collect information that your browser, device, or wallet automatically sends when you use our Services. Log data includes your Internet Protocol address, browser type and settings, device information, operating system, the date and time of your requests, pages visited, features used, errors encountered, and how you interact with our Services and AI agents.

**Usage Data:** We collect information about your use of the Services, such as the types of AI agents you interact with, features you use, actions you take, session duration,

frequency of use, platform performance metrics, user journey analytics, and your time zone, country, language preferences, and dates and times of access.

**Blockchain Analytics:** We collect publicly available blockchain data related to your activities, including transaction patterns, gas usage, smart contract interactions, token holdings, DeFi activities, governance participation, and network participation metrics.

**Device Information:** We collect information about the device you use to access the Services, such as device identifiers, hardware specifications, operating system version, browser information, mobile device type, screen resolution, and device performance metrics.

**Location Information:** We may determine the general area from which your device accesses our Services based on information like IP address for security, compliance, and service optimization purposes. Some Services may request more precise location information for enhanced functionality, always with your explicit consent.

**Cookies and Similar Technologies:** We use cookies, web beacons, local storage, and similar technologies to operate our Services, remember your preferences, analyze usage patterns, prevent fraud, and improve your experience. For details about our use of cookies, please read our Cookie Notice.

## **Information We Receive from Other Sources**

**Security and Compliance Partners:** We receive information from trusted security partners to protect against fraud, abuse, money laundering, and other security threats to our Services and blockchain infrastructure.

**Blockchain Data Providers:** We collect publicly available blockchain data from various networks to enhance our Services, including transaction data, token information, DeFi protocol data, and network analytics.

**Marketing and Analytics Partners:** We receive information from marketing vendors and analytics providers about potential users, market trends, and Service performance.

**Public Data Sources:** We collect information that is publicly available on the internet, including social media data, public blockchain records, and other publicly accessible information to develop and improve our AI models and Services.

**Integration Partners:** We receive data from third-party services that integrate with our platform, including wallet providers, DeFi protocols, other blockchain networks, and development tools.

## **2. How We Use Personal Data**

We may use Personal Data for the following purposes:

**Service Provision and Management:** To provide, maintain, analyze, and improve our Services, including processing blockchain transactions, facilitating AI agent interactions, managing user accounts, enabling tokenization activities, processing payments, and providing customer support.

**AI Development and Training:** To develop, train, and improve our AI models and agents, including enhancing agent personalities, improving conversation quality, developing new agent capabilities, optimizing user matching and recommendations, and creating more engaging interactive experiences.

**Platform Optimization:** To analyze usage patterns, optimize platform performance, enhance user experience, develop new features, conduct research and development, and ensure platform security and stability.

**Communication and Marketing:** To communicate with you about our Services, send updates and announcements, provide technical notices, deliver marketing communications (with your consent), notify you about new features or agents, and respond to your inquiries.

**Security and Compliance:** To prevent fraud, illegal activity, or misuses of our Services, protect the security of our systems and users, comply with legal obligations, enforce our terms and conditions, detect and prevent money laundering and terrorist financing, and maintain blockchain network integrity.

**Blockchain Operations:** To operate and maintain our blockchain infrastructure, validate transactions, secure the network, facilitate governance activities, manage tokenization processes, and ensure network consensus and security.

**Business Operations:** To operate our business, including analytics and reporting, financial management, legal compliance, corporate governance, and strategic planning.

We may also aggregate or de-identify Personal Data so that it no longer identifies you and use this information for research, analytics, product development, and other business purposes. We will maintain and use de-identified information in de-identified form and not attempt to reidentify the information, unless required by law.

As noted above, we may use AI Interaction Data and other content you provide to improve our Services and train our AI models. You can learn more about how to opt out of certain uses of your data in our AI Training Data Notice.

### **3. Disclosure of Personal Data**

We may disclose your Personal Data in the following circumstances:

**Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may disclose Personal Data to vendors

and service providers, including blockchain infrastructure providers, cloud hosting services, AI model training services, customer service vendors, payment processors, security monitoring services, analytics providers, marketing service providers, and other technology vendors. These parties will access, process, or store Personal Data only as necessary to perform their duties to us.

**Blockchain Networks and Protocols:** Some Personal Data may be disclosed to blockchain networks, validators, and protocol participants as necessary for blockchain operations, including transaction data, wallet addresses, smart contract interactions, and other information required for blockchain functionality and consensus.

**AI Agent Ecosystem:** Information may be shared within our AI agent ecosystem to facilitate agent interactions, cross-platform functionality, agent development, tokenization activities, and community features. This includes sharing data between our subsidiaries and affiliated platforms.

**Business Transfers:** If we are involved in strategic transactions, reorganization, bankruptcy, receivership, or transition of service to another provider, your Personal Data may be disclosed in the diligence process and transferred as part of that transaction along with other assets.

**Legal and Regulatory Compliance:** We may share your Personal Data with government authorities, law enforcement, regulators, or other third parties when required to comply with legal obligations, court orders, or regulatory requirements, to protect and defend our rights or property, to investigate potential violations of our terms or policies, to detect or prevent fraud or illegal activity, or to protect the safety and security of our users and the public.

**Affiliates and Subsidiaries:** We may disclose Personal Data to our affiliates and subsidiaries, including Rugged Club, LLC and Tallys, LLC, for business operations, service provision, and the purposes described in this Privacy Policy.

**User-Directed Sharing:** Certain features allow you to interact or share information with other users, AI agents, or third parties. For example, you may share agent interactions publicly, participate in community features, integrate with external wallets or applications, or use cross-platform functionality. Information you choose to share is governed by the privacy practices of the receiving parties.

**Emergency Situations:** We may disclose Personal Data when we believe in good faith that disclosure is necessary to prevent imminent harm to any person or to address emergency situations.

#### **4. Blockchain and Decentralization Considerations**

**Public Blockchain Data:** Certain information may be recorded on public blockchains and become permanently and publicly accessible. This includes transaction data, smart

contract interactions, token transfers, governance votes, and other blockchain activities. Once recorded on a blockchain, this information generally cannot be modified or deleted.

**Decentralized Storage:** Some data may be stored using decentralized storage solutions like IPFS or Walrus. While these systems provide enhanced security and availability, they may also affect our ability to modify or delete certain information.

**Agent Autonomy:** As AI agents become more autonomous, they may make independent decisions about data collection, storage, and sharing within the parameters of their programming and applicable legal requirements.

**Cross-Chain Activities:** Your activities across multiple blockchain networks may be linkable through various analytical techniques, even when using different wallet addresses.

## 5. International Data Transfers

Talus processes Personal Data on servers located in various jurisdictions, including in the United States. While data protection laws vary by country, we apply the protections described in this Privacy Policy to your Personal Data regardless of where it is processed. We transfer Personal Data internationally only pursuant to legally valid transfer mechanisms and appropriate safeguards.

For individuals in the European Economic Area, United Kingdom, and Switzerland, we rely on adequacy decisions, Standard Contractual Clauses, and other approved transfer mechanisms when transferring Personal Data outside these regions.

## 6. Data Retention

We retain Personal Data for only as long as necessary to provide our Services, fulfill the purposes described in this Privacy Policy, comply with legal obligations, resolve disputes, and enforce our agreements. Retention periods depend on various factors, including:

**Service Provision Needs:** How long we need the data to provide ongoing Services, maintain user accounts, and support platform functionality.

**Data Type and Sensitivity:** Different types of data have different retention requirements based on their nature, sensitivity, and regulatory requirements.

**Legal and Regulatory Requirements:** Applicable laws may require us to retain certain data for specific periods, particularly for financial services, blockchain operations, and compliance purposes.

**User Preferences:** Your account settings and data management choices may affect retention periods for certain types of data.

**Blockchain Immutability:** Data recorded on blockchains may be retained indefinitely due to the immutable nature of blockchain technology.

For specific information about retention periods for different types of data, please contact us using the information provided below.

## 7. Your Rights and Choices

Depending on where you live, you may have certain statutory rights regarding your Personal Data:

**Access Rights:** You may request access to your Personal Data and information about how it is processed, including details about data sources, processing purposes, and data recipients.

**Correction Rights:** You may request that we update or correct inaccurate or incomplete Personal Data about you.

**Deletion Rights:** You may request deletion of your Personal Data, subject to certain limitations including legal requirements, blockchain immutability, and legitimate business needs.

**Portability Rights:** You may request to receive your Personal Data in a structured, commonly used format or to have it transmitted to another service provider where technically feasible.

**Restriction Rights:** You may request that we restrict certain processing of your Personal Data under specific circumstances defined by applicable law.

**Objection Rights:** You may object to certain types of processing, including processing for direct marketing purposes and processing based on legitimate interests.

**Consent Withdrawal:** Where we rely on your consent for processing, you may withdraw your consent at any time, though this will not affect the lawfulness of processing before withdrawal.

**Complaint Rights:** You may lodge a complaint with your local data protection authority if you believe we have violated your privacy rights.

**Blockchain Limitations:** Please note that certain rights may be limited or impossible to fulfill for data recorded on immutable blockchains or processed by autonomous AI agents.

You can exercise many of these rights through your account settings. For other requests, please contact us using the information provided below. We will respond to valid requests in accordance with applicable law, typically within 30 days.

**AI-Generated Content Accuracy:** AI agents may generate responses that contain factually inaccurate information. If you notice inaccurate information about you in AI-generated content, you may request correction or removal, and we will consider your request based on applicable law and the technical capabilities of our systems.

## 8. Children's Privacy

Our Services are not directed to children under 13 years of age, and we do not knowingly collect Personal Data from children under 13. If you have reason to believe that a child under 13 has provided Personal Data to us, please contact us using the information below. We will investigate any notification and, if appropriate, delete the Personal Data from our systems.

Users between 13 and 18 years of age must have permission from their parent or guardian to use our Services and may have additional protections under applicable law.

## 9. Security

We implement comprehensive technical, administrative, and organizational measures designed to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Our security measures include:

**Technical Safeguards:** Encryption of data in transit and at rest, access controls and authentication systems, network security measures, regular security assessments, and blockchain-specific security protocols.

**Administrative Safeguards:** Employee training and access controls, incident response procedures, privacy and security policies, vendor management programs, and regular security audits.

**Organizational Measures:** Privacy by design principles, data minimization practices, security governance frameworks, and continuous monitoring and improvement programs.

However, no Internet transmission or electronic storage is completely secure. You should take special care in deciding what information you provide through our Services and protect your account credentials and wallet private keys.

## 10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, Services, legal requirements, or other factors. We will notify you of material changes by posting the updated Privacy Policy on our website, sending notice through our Services, or other appropriate means. Your continued use of our Services after the effective date of changes constitutes acceptance of the updated Privacy Policy.

## 11. Contact Information



For questions about this Privacy Policy, to exercise your privacy rights, or to contact our Data Protection Officer, please reach out to us at:

**Email:** [hi@taluslabs.xyz](mailto:hi@taluslabs.xyz)

**Website:** <https://talus.network/privacy-policy>

**Address:** 6000 Island Blvd. Aventura, FL 33160

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**Effective Date:** This Privacy Policy is effective as of July 3<sup>rd</sup>, 2025 and was last updated on July 3<sup>rd</sup>, 2025.