

AZUKI.COM PRIVACY POLICY

Last Updated as of March 15, 2026

Azuki Labs, Inc. (“Azuki,” “we,” “us,” or “our”) is committed to protecting your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard information about you when you visit our websites, including azuki.com and all associated subdomains (including tcg.azuki.com) (collectively, the “Site”), and when you purchase or interact with our products and services. Please read this Privacy Policy carefully. By using the Site or purchasing Company Products, you agree to the terms of this Privacy Policy. If you do not agree, please discontinue use of the Site.

This Privacy Policy is incorporated by reference into our Terms & Conditions. Capitalized terms not defined in this Privacy Policy have the meanings given to them in our Terms & Conditions.

1. Information We Collect

1.1 Information You Provide Directly

We collect personal information that you voluntarily provide when you use our Site or purchase Company Products, including:

- Identifiers: Name, email address, username, and account credentials.
- Contact and Shipping Information: Billing address, shipping address, and phone number.
- Payment Information: Payment card details and billing information. Payment card data is processed and stored by our designated third-party payment processor (currently Shopify); we do not store raw card numbers.
- Cryptocurrency Wallet Information: Wallet addresses provided in connection with digital asset purchases or cryptocurrency payment transactions.
- Communications: Messages, inquiries, or feedback you send to us via email or contact forms.
- Marketing Preferences: Your opt-in or opt-out status for marketing communications.

1.2 Information Collected Automatically

When you visit our Site, we and our third-party service providers may automatically collect certain technical and usage information, including:

- Device and Browser Information: IP address, browser type and version, operating system, device identifiers.
- Usage Data: Pages visited, time spent on pages, links clicked, referring URLs, and other interaction data.
- Cookies and Similar Technologies: We use cookies, web beacons, and similar tracking technologies to enhance your experience, analyze Site usage, and support marketing activities. You may control cookie settings through your browser; note that disabling certain cookies may affect Site functionality. We will separately provide a cookie consent mechanism where required by applicable law.

1.3 Information from Third Parties

We may receive information about you from third-party sources, including:

- **Payment Processors:** Shopify and other payment service providers may share transaction-related information with us.
- **Analytics Providers:** Services such as Google Analytics that provide aggregated information about Site usage.
- **Social Media Platforms:** If you interact with us through social media, we may receive information consistent with your privacy settings on those platforms.

2. How We Use Your Information

We use the personal information we collect for the following purposes:

- **Order Fulfillment:** To process and fulfill your purchases, including payment processing, shipping, delivery, and order tracking.
- **Account Management:** To create and manage your account on the Site.
- **Customer Communications:** To send you transactional communications, including order confirmations, shipping notifications, address verification requests, and customer service responses. These communications are sent regardless of your marketing preferences.
- **Marketing Communications:** With your separate consent (provided via opt-in at checkout or through a signup form on the Site), to send you promotional emails about Azuki products, services, events, and news. You may opt out at any time by clicking the “unsubscribe” link in any marketing email or by contacting us at the address below.
- **Site Improvement and Analytics:** To understand how users interact with the Site, identify usage trends, and improve our products, services, and Site functionality.
- **Legal Compliance:** To comply with applicable laws and regulations, including U.S. export control laws, OFAC regulations, and other legal obligations.
- **Fraud Prevention and Security:** To detect, investigate, and prevent fraudulent transactions, unauthorized access, and other illegal or harmful activities.
- **Dispute Resolution:** To enforce our Terms & Conditions and resolve disputes.

3. How We Share Your Information

We do not sell your personal information to third parties. We may share your information in the following circumstances:

3.1 Service Providers

We share personal information with third-party vendors and service providers that perform services on our behalf, including:

- **Payment Processors:** Shopify (payment processing and e-commerce infrastructure).
- **Shipping and Fulfillment Partners:** Carriers such as UPS, FedEx, DHL, and third-party logistics providers.
- **Email and Marketing Platforms:** Providers we use to send transactional and marketing communications.

- Analytics Providers: Services that help us understand Site traffic and user behavior.
- Cloud and Hosting Services: Providers that host and operate our Site infrastructure.

These service providers are authorized to use your personal information only as necessary to provide services to us and are subject to confidentiality obligations.

3.2 Legal Requirements

We may disclose personal information where required by applicable law, regulation, court order, or government authority, including in connection with OFAC compliance, export control regulations, or other legal process.

3.3 Business Transfers

In the event of a merger, acquisition, reorganization, bankruptcy, or sale of all or a portion of our assets, your personal information may be transferred as part of that transaction. We will notify you via email or a prominent notice on the Site if your information becomes subject to a different privacy policy as a result.

3.4 Protection of Rights

We may disclose personal information when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

4. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, including to satisfy legal, accounting, or reporting obligations. For transactional data (purchase records, shipping information), we generally retain information for a minimum of five (5) years to comply with applicable tax and commercial record-keeping requirements. Marketing opt-in records are retained for the duration of the marketing relationship and for a period thereafter sufficient to demonstrate consent. You may request deletion of your personal information subject to Section 6 below.

5. Cookies and Tracking Technologies

We use cookies and similar tracking technologies on the Site. Cookies are small data files stored on your device. We use the following types of cookies:

- Strictly Necessary Cookies: Required for the Site to function (e.g., shopping cart, checkout session). These cannot be disabled.
- Analytics Cookies: Help us understand how visitors interact with the Site (e.g., Google Analytics). These are set only with your consent where required.
- Marketing Cookies: Used to deliver relevant advertisements and track campaign performance. These are set only with your consent where required.

You can manage your cookie preferences through your browser settings or through any cookie consent tool we provide on the Site. Note that disabling certain cookies may impact Site functionality.

6. Your Privacy Rights

6.1 California Residents — CCPA/CPRA

If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA):

- **Right to Know:** You have the right to request disclosure of the categories and specific pieces of personal information we have collected about you, the categories of sources, the business or commercial purposes for collection, and the categories of third parties with whom we share it.
- **Right to Delete:** You have the right to request deletion of personal information we have collected from you, subject to certain exceptions.
- **Right to Correct:** You have the right to request correction of inaccurate personal information we maintain about you.
- **Right to Opt Out of Sale or Sharing:** We do not sell or share your personal information for cross-context behavioral advertising. If this practice changes, we will provide a “Do Not Sell or Share My Personal Information” link on our Site.
- **Right to Limit Use of Sensitive Personal Information:** We do not use sensitive personal information for purposes beyond those necessary to provide our services.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA/CPRA rights.

To submit a request under the CCPA/CPRA, please contact us at help@azuki.com or through the contact information in Section 11 below. We will verify your identity before processing your request and will respond within 45 days, with an extension of up to an additional 45 days where necessary.

6.2 European Union and United Kingdom Residents — GDPR/UK GDPR

If you are located in the European Union or United Kingdom, you have the following rights under the General Data Protection Regulation (GDPR) and/or UK GDPR:

- **Right of Access:** You may request a copy of the personal data we hold about you.
- **Right to Rectification:** You may request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** You may request deletion of your personal data in certain circumstances.
- **Right to Restrict Processing:** You may request that we limit how we use your personal data in certain circumstances.
- **Right to Data Portability:** You may request a machine-readable copy of the personal data you have provided to us.
- **Right to Object:** You may object to our processing of your personal data where we rely on legitimate interests as the legal basis.
- **Right to Withdraw Consent:** Where processing is based on consent (such as for marketing communications), you may withdraw consent at any time without affecting the lawfulness of prior processing.

Our legal bases for processing your personal data are: (i) performance of a contract (order fulfillment and account management); (ii) compliance with legal obligations (OFAC, export controls, tax requirements);

(iii) legitimate interests (fraud prevention, Site analytics, security); and (iv) consent (marketing communications, certain cookies).

To exercise your GDPR/UK GDPR rights, contact us at help@azuki.com. You also have the right to lodge a complaint with your local supervisory authority.

6.3 All Users

Regardless of your location, you may at any time: (i) opt out of marketing emails by clicking the unsubscribe link in any such email or contacting us directly; (ii) request access to or correction of personal information we hold about you; or (iii) request deletion of your account. We will honor such requests to the extent permitted by applicable law and consistent with our legal obligations.

7. Data Security

We implement commercially reasonable technical, organizational, and physical safeguards designed to protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include encrypted data transmission (SSL/TLS), access controls, and use of reputable third-party payment processors that maintain their own security programs. However, no security measures are completely failsafe, and we cannot guarantee absolute security of your personal information. You are responsible for maintaining the confidentiality of any account credentials and for notifying us promptly of any suspected unauthorized access.

8. Children's Privacy

The Site is intended for users who are at least 18 years old. We do not knowingly collect personal information from persons under the age of 18. If you believe we have inadvertently collected information from a minor, please contact us immediately at help@azuki.com and we will take steps to delete such information.

9. Third-Party Links

The Site may contain links to third-party websites, including social media platforms, marketplace sites, and partner pages. This Privacy Policy does not apply to those third-party sites, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party sites you visit.

10. International Data Transfers

Azuki Labs, Inc. is based in the United States. If you access the Site from outside the United States, your personal information will be transferred to and processed in the United States, where data protection laws may differ from those in your jurisdiction. Where required by applicable law (including for transfers from the EU/UK), we implement appropriate safeguards for such transfers, such as standard contractual clauses approved by the European Commission or the UK Information Commissioner's Office.

11. Contact Us

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

Azuki Labs, Inc.

Attn: Privacy

Email: help@azuki.com

Website: azuki.com/privacy-policy

We will respond to privacy-related inquiries within a reasonable time and in accordance with applicable law.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. We will post the updated Privacy Policy on this page with a revised “Last Updated” date. For material changes, we will provide additional notice (such as a banner on the Site or email notification to registered users). Your continued use of the Site after any update constitutes acceptance of the revised Privacy Policy.