

# ODOM Privacy Policy

**Thank you for choosing to use the ODOM platform** (hereinafter referred to as "this Platform" or "we"). We deeply understand the importance of personal privacy to you and are committed to strictly adhering to privacy protection measures when collecting, using, and storing your personal information. This privacy policy aims to transparently explain how we collect, use, store, protect, and share your personal information, ensuring that you can use our services with peace of mind and understand how we protect your privacy.

Before using the services provided by this Platform, please carefully read this privacy policy. By using our services, you agree to the terms of this privacy policy and authorize us to handle your personal information in accordance with this policy. If you do not agree with this policy, please do not use the services of this Platform.

## 1. Information Collection

### 1.1 Types of Information Collected

To ensure the stable operation of the ODOM Platform, transaction security, and user rights, we may collect the following types of information under the principle of "minimizing information collection":

**Blockchain addresses and on-chain identity information:** When you connect your wallet and perform ODOM token-related operations (such as minting, transferring, authorizing, destroying, governance voting, etc.), we will identify and record your public wallet address. In scenarios involving fiat currency exchange or legal compliance (such as KYC/AML), you may need to submit relevant identity materials, including but not limited to: email, phone number, nationality, ID documents (such as passport number, ID number), residential address, date of birth, etc.

**Transaction and on-chain activity information:** We will automatically record and analyze your transaction activities on the ODOM Platform or smart contracts, including token trading, DAO participation, staking, adding/removing liquidity, etc. The relevant information includes but is not limited to: transaction time, amount, counterparty address, transaction hash, etc. All this data is stored on the blockchain, and ODOM does not have the permission to modify it; it is only used for visualization, user queries, and risk identification.

**Payment and interaction information:** If you purchase ODOM tokens or participate in charitable actions through integrated third-party payment services (such as SOL payment, stablecoin exchange), the relevant payment account information (such as address, amount, timestamp) will be collected for payment confirmation and order processing. ODOM Platform does not store your private keys or payment authorization information.

**Device and technical information:** To improve product compatibility and platform performance, we may collect, including but not limited to: access device type, operating system, browser version, IP address, network environment, access time, regional preferences, etc. This data helps us in error debugging, device adaptation, and content recommendation optimization.

**User behavior data:** We may generate anonymized usage data based on your interactions on the front-end interface (such as page browsing, click paths, form submissions, search keywords), which is used for product optimization and user experience improvement. This type of data is not directly associated with your wallet address and complies with the technical standards of Web3 user privacy rights.

**Communication information:** If you contact our customer service through the Platform, we will collect your relevant information, including communication records, inquiry content, and solutions. This information helps us improve customer support services and solve problems you encounter while using the Platform.

## **1.2 Methods of Information Collection**

We collect your information through the following methods:

**Information you actively provide:** When you register an account, conduct transactions, contact customer service, or participate in Platform activities, all the information you actively provide will be collected by us. Through this information, we can provide you with personalized services and ensure the normal operation of the Platform.

**Automatic collection:** We may use front-end analysis tools, smart contract listeners, logging systems, cookies, pixel tags, etc., to automatically collect device parameters and behavior data related to your usage. This information, after being anonymized, is used for Platform analysis and service improvement.

**Third-party authorized acquisition:** Under the premise of your explicit authorization, we may obtain necessary information from cooperating wallets, KYC suppliers, or on-chain data

analysis service providers (such as on-chain reputation scores, address labels, security risk ratings, etc.) to perfect your account profile and risk control system.

## 2. Information Use

In the ODOM ecosystem, we are committed to reasonably using necessary information while ensuring user privacy to provide a stable, secure, compliant, and personalized token service experience. We collect and use your information mainly for the following purposes:

**Establishing accounts and verifying decentralized identities:** To ensure the security of your ODOM account and the ownership of on-chain assets, we may use your identity information when creating an account, connecting a wallet, completing KYC authentication, or setting security permissions. This process helps prevent unauthorized access, contract abuse, or asset theft, ensuring that you have legitimate account usage rights and asset sovereignty.

**Processing on-chain transactions and executing functions:** We will use your wallet address, signature authorization, on-chain transaction records, etc., to assist you in smoothly completing a series of on-chain operations such as transferring, exchanging, authorizing, destroying ODOM tokens, and generating transparent, traceable transaction histories for you. All operations are automatically executed by smart contracts, and the Platform does not store your private keys or control rights.

**User support and product experience optimization:** When you encounter problems while using the ODOM Platform or submit feedback, we will process the relevant information within the necessary scope to provide you with quick-response customer support, technical debugging, and operational guidance. We may also optimize product processes, smart contract performance, and user interfaces based on anonymized interaction data to continuously improve the stability and usability of the Platform.

**Personalized product recommendations and community interactions:** Based on your interactions on the ODOM Platform (such as participating in projects, on-chain activity, participating in governance voting, etc.), we may, with your authorization, provide you with customized recommendations for Platform functions, charitable actions, or governance proposals. The recommendation process uses on-chain address profiles and intelligent algorithms, respects your data autonomy, and you can cancel or modify your preference settings at any time.

**Compliance reviews and security risk controls:** The ODOM Platform strictly abides by global compliance requirements. To prevent money laundering, terrorist financing, market manipulation, etc., we may automatically monitor and risk-score on-chain transaction behaviors. When necessary, we will combine KYC authentication information and on-chain behavior data to conduct anti-money laundering (AML) and risk reviews to ensure the legality and stability of the Platform's operation and ecosystem.

### 3. Information Sharing and Disclosure

The ODOM Platform fully respects and values the confidentiality of user data and will never sell your personal information for commercial purposes without authorization. We only share and disclose information in a limited manner for legitimate purposes such as ensuring Platform operation, compliance management, and user experience optimization, under the premise of complying with applicable laws and technical norms.

#### 3.1 Sharing Information with Third Parties

To ensure the normal operation and user experience of ODOM token-related services, we may share necessary data with carefully selected third parties in the following scenarios:

**Payment and settlement service providers:** When users purchase or exchange tokens through off-chain fiat channels, it may involve sharing payment account or identity authentication information with regulated third-party payment institutions or cryptocurrency exchange platforms (such as OTC merchants) to complete the transaction process.

**Blockchain infrastructure providers:** Such as node operators, public chain service providers, or cross-chain bridge platforms, which may indirectly access your wallet address, transaction hash, and technical metadata when processing on-chain transactions, smart contract calls, or wallet interactions. This type of information does not have the ability to directly identify your identity and is usually restricted by the automatic execution logic of smart contracts.

**Compliance and identity verification service agencies:** Under the requirements of anti-money laundering (AML) and know your customer (KYC) systems, the Platform may entrust qualified identity authentication service providers to complete the identity verification process, and the required personal identity information will be strictly used for compliance review purposes and only within the scope necessary to complete the verification process.

**Marketing and analytics partners:** With your explicit consent, we may collaborate with marketing service providers to analyze your non-sensitive behavioral data on the Platform (such as page browsing, interaction preferences, etc.) to achieve personalized recommendations, user profile optimization, or conduct de-identified data statistical analysis. We will not allow them to use this information for purposes beyond the authorized scope.

ODOM is committed to adhering to the principle of data minimization in all instances of data sharing. We employ technical measures, including data desensitization and encrypted transmission, as well as contractual obligations such as data processing agreements and confidentiality clauses, to safeguard the security and ensure the lawful use of information throughout the sharing process.

### **3.2 Legal and Compliance Disclosures**

We may disclose your personal information or on-chain activity data in the following specific situations based on applicable laws, regulatory obligations, or Platform risk prevention needs:

**Legal requirements:** When local regulatory agencies, tax authorities, courts, law enforcement agencies, etc., legally request information disclosure, we will cooperate by providing the required information, including but not limited to identity authentication materials, transaction records, on-chain interaction data, etc.

**Compliance investigations and anti-money laundering obligations:** To fulfill anti-money laundering (AML), counter-terrorism financing (CTF), and sanctions compliance responsibilities, we may investigate high-risk transactions or abnormal account behaviors based on internal risk control rules or third-party system prompts and submit relevant information to legitimate and compliant regulatory agencies or cooperative review platforms.

**Protection of Platform legitimate rights:** If user behavior is suspected of fraud, market manipulation, account theft, or other behaviors that may harm the security and order of the ODOM Platform ecosystem, we have the right to disclose relevant information according to the Platform usage agreement or take measures such as restricting services and temporarily freezing assets to protect the legitimate rights of the Platform and other users.

**Protection of life and property safety:** In cases involving personal injury, property damage, or public safety incidents, we will disclose relevant information in accordance with legal premises to protect your own, other users of the Platform, or the public's fundamental interests.

### 3.3 Platform Changes and Asset Transfers

If the ODOM Platform or its key business sectors undergo mergers, reorganizations, liquidations, asset sales, or other changes in control, user information may be transferred as part of the assets or operational resources to the successor entity. The receiving party will continue to be bound by this privacy policy or equivalent privacy protection obligations, unless the user separately authorizes otherwise.

During any information transfer process, we will follow legal, prudent, and transparent principles and, as much as possible, notify users in advance through announcements or emails to ensure your right to know and choose how your information is handled.

## 4. Data Security and Protection

### 4.1 Security Measures

We highly value user data security and have adopted multi-layered security strategies and industry standards under the Web3 architecture to ensure the integrity and immutability of information. Specific measures include but are not limited to:

**Immutability of on-chain data:** ODOM's transaction data and core logic run on decentralized blockchain networks (such as Solana), with all interaction information automatically executed by smart contracts and publicly recorded on-chain, ensuring transparency and traceability of data.

**Encryption of front-end and API transmissions:** We use HTTPS, SSL, and other encryption protocols to protect user access and data interactions on the Platform interface, preventing man-in-the-middle attacks and data leaks.

**Access permissions and minimal authorization mechanisms:** Backend services only authorize the minimum necessary personnel to access user information, with all operations recorded and audited, strictly controlling personnel permissions to prevent human abuse or operational errors.

**Security monitoring and attack warning systems:** We have deployed real-time monitoring systems such as smart contract vulnerability scans, abnormal traffic detection, DDoS protection, and node monitoring to respond to potential attack behaviors.

### 4.2 User Responsibilities

ODOM emphasizes that "users have autonomous management rights over their private keys and identity information." Please note:

You are fully responsible for your wallet private keys, mnemonics, access tokens, etc.; we neither store nor can recover this data.

We recommend that you back up your wallet keys properly and avoid storing them in network or device environments that are easy to lose.

If you suspect that your wallet has been stolen, your mnemonics leaked, or you have been subjected to phishing attacks, please immediately disconnect from the Platform and take necessary self-protection measures.

If you encounter any suspicious events during use, you can report them to us through official channels, and we will assist you in investigating the situation and providing technical support.

## 5. Data Storage and Retention

### 5.1 Data Storage Methods and Locations

ODOM Platform adheres to the principle of "prioritizing on-chain storage and minimizing off-chain storage":

**On-chain data storage:** Transaction records, user interactions, etc., related to ODOM tokens are all publicly recorded on the blockchain network, and the Platform does not store or modify on-chain data.

**Off-chain service data:** For compliance, operation, or service purposes, KYC verification materials, contact information, customer service records, etc., that you may submit will be stored in encrypted servers of us or authorized third-party compliant service providers, which may be located in different judicial jurisdictions and comply with local data protection laws.

We will take strict security measures to protect off-chain stored data to ensure it is not used for unauthorized purposes.

### 5.2 Data Retention Period

**Permanent retention of on-chain data:** All data written to the blockchain will be permanently stored and publicly accessible and cannot be deleted or modified.

**Retention of off-chain information:** For off-chain personal information you provide, we will retain it for the shortest period necessary to achieve the purpose of information collection; once you initiate an account cancellation request or terminate service, we will, within technically feasible scope, de-identify or completely delete non-essential information, unless we have a legal obligation to retain that data (e.g., financial audits, anti-money laundering investigations, etc.).

**KYC and compliance retention obligations:** If you complete identity verification, according to regulatory requirements, we may need to retain relevant records for several years after you exit and take desensitization measures.

## **6. Your Rights**

We respect and guarantee your control over personal information. According to applicable data protection laws, during your use of ODOM Platform services, you have the following rights:

### **6.1 Access and Update Information**

You have the right to access off-chain personal information held by us related to you (such as email, communication records, etc.). You can inquire and update this information through the Platform interface or by contacting customer service to ensure its accuracy and timeliness.

Please note: On-chain transaction data (such as wallet addresses, transfer records, etc.) is public information that anyone can view through blockchain explorers; the Platform cannot modify or hide this information.

### **6.2 Request to Delete Information**

If you no longer use the Platform services or the purpose of processing personal information has been achieved, you can request, we to delete the off-chain information you provided (such as KYC materials, contact information, etc.). We will process this request as soon as possible under the premise of meeting legal requirements. However, in the following situations, we may still need to retain relevant data:

Fulfilling legal obligations (such as retaining anti-money laundering audit records);

Fulfilling contractual obligations or resolving disputes;

Necessary to prevent fraud or ensure Platform security.

### **6.3 Data Portability**

If you need to transfer personal information related to you to another platform, we will, upon your request, provide a copy of your off-chain data in a structured, commonly used, and machine-readable format (such as JSON or CSV) to assist you in data migration.

### **6.4 Withdraw Consent**

You can withdraw your consent to the collection and use of your off-chain personal information at any time, but this will not affect the legality of data processing based on consent before your withdrawal.



Please note that if you withdraw certain consents, it may affect your continued use of certain Platform functions (such as customer service, activity participation, etc.), and we will clearly explain this to you at the time of withdrawal.

## **7. Protection of Minors' Privacy**

ODOM Platform is specifically designed for adults with full civil capacity and does not provide any services to minors under 18 years old.

We will not knowingly collect any personal information from minors. If we discover that there is information provided by minors in the system, we will promptly delete the relevant data. If you are a guardian and find that a minor has misused this Platform, please immediately contact us through official channels, and we will assist in handling the relevant content.

## **8. Privacy Policy Updates**

### **8.1 Policy Update Notifications**

To adapt to changes in laws, technological upgrades, or product adjustments, we may update this privacy policy from time to time. After the policy is updated, we will notify you through Platform announcements, emails, or wallet pushes. Please pay attention to relevant channels to timely understand the updated content.

### **8.2 Policy Revisions**

Before each update takes effect, we will require you to review and confirm your agreement again; if you continue to use ODOM Platform services, it will be deemed that you have accepted the updated privacy policy content. We recommend that you check this page regularly to understand how we protect your data rights and privacy security.

In the wave of Web3, ODOM always places user data sovereignty, privacy security, and transparent trust at the core of system design. The Platform adopts a decentralized architecture and on-chain governance to ensure that every decision and fund flow can be audited and is immutable.

ODOM not only continues Lamar Odom's story of rebirth but also promotes a global consensus movement centered on 'sobriety culture.' By combining token models with charitable mechanisms, we hope to bring lasting and real value empowerment to global drug rehabilitation, psychological health, and other causes.

If you have any questions or cooperation intentions, please contact us through official channels. Thank you for reading ODOM Platform's privacy policy.