

WHALESCAN PRIVACY POLICY

Last updated: 10 August 2026

Data controller / platform operator: Liberandum AI FZCO | License number: 46951

1. Introduction

This Privacy Policy explains how Liberandum AI FZCO (the “Company”, “we”, “us” or “our”), as operator of WhaleScan, collects, uses, stores, discloses and protects Personal Data when you access or use <https://whalescan.net/> and related WhaleScan services, accounts, subscriptions, communications and software features (collectively, the “Platform”).

Liberandum AI FZCO is registered in the United Arab Emirates (UAE), with its registered address at Building A1, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates.

This Privacy Policy is intended to describe our privacy practices in accordance with applicable data protection requirements, including the UAE Federal Decree-Law No. 45 of 2021 Concerning the Protection of Personal Data, where applicable.

By using the Platform, you acknowledge the practices described in this Privacy Policy. Where consent is required by applicable law, we will request it separately or through an appropriate consent mechanism.

2. Scope and Definitions

For the purposes of this Privacy Policy, “Personal Data” means information relating to an identified or identifiable natural person. Depending on the circumstances, an online identifier, IP address, device identifier or public blockchain address may constitute Personal Data where it can reasonably be linked to an identifiable individual.

This Privacy Policy applies to Personal Data processed by WhaleScan. It does not govern the privacy practices of independent third-party websites, blockchain networks, prediction markets, payment providers, authentication providers or other external services that may be referenced by or linked from the Platform.

3. Personal Data We May Collect

Depending on how you use WhaleScan, we may collect the following categories of information:

- Account and contact data, such as your name or display name, email address, login credentials or authentication identifiers, and information you voluntarily provide when contacting us.
- Subscription and transaction data, such as subscription plan, billing status, payment confirmation, transaction reference, currency, payment date and related records. Full payment card details may be processed directly by a third-party payment provider rather than stored by WhaleScan.
- Technical and device data, such as IP address, browser type, device type, operating system, language, time zone, approximate location derived from technical information, session identifiers and security logs.
- Usage data, such as pages viewed, features used, clicks, session activity, referral source, interaction with alerts or dashboards, timestamps and diagnostic information.
- Cookie and similar technology data, where cookies, local storage, pixels or similar technologies are used for essential functionality, security, preferences, analytics or other purposes described in this Policy or a cookie notice.
- Support and communications data, including messages, requests, feedback and records of correspondence with our support or business teams.

- Public blockchain and market data, including public wallet addresses, transaction history, on-chain activity, publicly observable positions, market activity and analytical classifications derived from public sources or third-party data providers.

4. Public Blockchain Data

A core function of WhaleScan is the analysis of publicly available blockchain and market information. Blockchain records are generally public and may remain permanently accessible on the relevant network independently of WhaleScan.

WhaleScan does not require ownership of a public blockchain address in order to analyse publicly observable activity associated with that address. We do not obtain private keys, seed phrases or custody of user assets through ordinary use of the Platform.

Where a public blockchain address or related public information can be linked to an identifiable individual, we will treat such information as Personal Data to the extent required by applicable law. However, we cannot alter, erase or control data that exists independently on a public blockchain or on a third-party network.

5. How We Collect Information

We may collect information:

- directly from you when you create an account, purchase a Subscription, contact us or otherwise provide information;
- automatically when you use the Platform, through server logs, cookies and similar technologies;
- from public blockchain networks, public websites, market data sources and other publicly accessible sources;
- from service providers and business partners that support authentication, hosting, security, payments, analytics, communications or other Platform functions, subject to applicable law and contractual safeguards.

6. Purposes of Processing

We may process Personal Data for the following purposes:

- to provide, operate, maintain and improve WhaleScan and its analytical features;
- to create and manage user accounts and Subscriptions;
- to authenticate users and protect accounts, systems and the Platform against fraud, abuse, unauthorised access and security threats;
- to process subscription payments and maintain billing and accounting records;
- to provide customer support and respond to inquiries, complaints or requests;
- to personalise settings, remember preferences and improve usability;
- to measure performance, diagnose errors, conduct analytics and develop or improve Platform features;
- to send service-related messages, security notices, policy updates and other administrative communications;
- to send marketing communications where permitted by law and, where required, with your consent;
- to comply with applicable law, lawful requests, sanctions requirements, legal proceedings and regulatory obligations;
- to establish, exercise or defend legal claims and enforce our Terms of Use.

7. Legal Basis and Consent

We process Personal Data only where there is an appropriate legal basis under applicable law. Depending on the context, processing may be based on your consent, the performance of a contract with you, compliance with a legal obligation, the establishment or defence of legal rights, processing of information made public by the Data Subject, or another lawful ground recognised by applicable law.

Where processing is based on consent, you may withdraw that consent in accordance with applicable law. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn and may affect our ability to provide certain optional features.

8. Cookies and Similar Technologies

WhaleScan may use cookies and similar technologies to operate the Platform, maintain sessions, remember preferences, protect the Platform, understand usage and improve performance.

Where required by applicable law, non-essential cookies or similar technologies will be used only after appropriate consent. You may be able to manage certain preferences through your browser settings or any cookie controls made available on the Platform.

Disabling essential cookies may affect the functionality or security of the Platform.

9. Sharing and Disclosure of Personal Data

We do not sell Personal Data. We may disclose Personal Data only where reasonably necessary for the purposes described in this Privacy Policy, including to:

- hosting, cloud infrastructure, cybersecurity, analytics, communications, customer support and technical service providers;
- payment processors and billing providers to process purchases and manage subscriptions;
- authentication providers where you choose to use a third-party login method;
- professional advisers, auditors, insurers or consultants where reasonably necessary;
- competent authorities, regulators, courts, law-enforcement bodies or other parties where disclosure is required or permitted by law;
- a purchaser, investor, successor or other relevant party in connection with a merger, acquisition, financing, restructuring, sale of assets or similar corporate transaction, subject to appropriate safeguards.

Service providers that process Personal Data on our behalf are expected to use it only for authorised purposes and to protect it in accordance with applicable contractual and legal requirements.

10. International and Cross-Border Transfers

WhaleScan may use infrastructure, service providers or business partners located outside the UAE. As a result, Personal Data may be transferred to or processed in other countries.

Where applicable data protection law requires safeguards for cross-border transfers, we will use an appropriate lawful transfer mechanism and reasonable contractual, organisational or technical measures designed to protect the transferred Personal Data.

11. Data Retention

We retain Personal Data only for as long as reasonably necessary for the purposes for which it was collected, including to provide the Platform, maintain business and transaction records, comply with legal or regulatory requirements, resolve disputes, enforce agreements and protect our legitimate legal interests.

Retention periods may vary depending on the category of data, the nature of our relationship with you, legal obligations, security needs and whether the information is required for an ongoing claim or dispute.

Public blockchain information may continue to exist on the underlying blockchain or third-party sources even after WhaleScan ceases to display or separately store related information.

12. Data Security

We implement reasonable technical and organisational measures designed to protect Personal Data against unauthorised access, accidental loss, destruction, alteration, disclosure or misuse. These measures may include access controls, authentication measures, logging, encryption where appropriate, system monitoring, network safeguards and internal access restrictions.

No internet transmission, blockchain network, storage system or security measure can guarantee absolute security. Users are responsible for protecting their account credentials and should not share passwords, private keys or seed phrases with WhaleScan or any third party claiming to represent WhaleScan.

13. Personal Data Breaches

If we become aware of a Personal Data breach, we will assess the incident and take reasonable steps to contain and remediate it. Where required by applicable law, we will notify the competent authority and/or affected Data Subjects in accordance with applicable legal requirements.

14. Your Data Protection Rights

Subject to applicable law, verification of identity and any lawful exceptions, you may have rights in relation to your Personal Data, including the right to:

- request information about the Personal Data we process, the purposes of processing, relevant recipients or categories of recipients, retention criteria and applicable safeguards;
- request correction of inaccurate Personal Data and completion of incomplete Personal Data;
- request erasure of Personal Data in circumstances provided by law;
- request restriction or cessation of certain processing;
- object to processing for direct marketing and certain other purposes recognised by applicable law;
- request transfer or receipt of Personal Data in a structured and machine-readable format where the applicable legal conditions are met;
- withdraw consent where processing is based on consent;
- raise a complaint with the competent data protection authority where you believe your rights have been infringed.

Some rights are not absolute. For example, we may retain information where required by law, for security and fraud prevention, for the establishment or defence of legal claims, or where another lawful exception applies. We also cannot erase or alter information recorded independently on a public blockchain.

15. Exercising Your Rights

To submit a privacy request, you may contact us using the details in Section 20 below. We may request information reasonably necessary to verify your identity and protect against unauthorised disclosure or deletion of Personal Data.

We will respond within the period required by applicable law. Where legally permitted, we may refuse or limit requests that are manifestly unfounded, excessively repetitive, conflict with legal proceedings or security obligations, or adversely affect the privacy and rights of others.

16. Marketing Communications

Where permitted by law, we may send you information about WhaleScan features, products, updates or offers. Where consent is required, we will obtain it before sending direct marketing communications.

You may opt out of marketing emails by using the unsubscribe mechanism included in the communication or by contacting us. You may continue to receive essential service, account, billing, legal or security communications after opting out of marketing.

17. Children

WhaleScan is not intended for children. The Platform is intended for users who are at least 18 years old. We do not knowingly seek to collect Personal Data from persons under 18 through the Platform.

If you believe that a person under 18 has provided Personal Data to us, please contact us so that we can review the matter and take appropriate action.

18. Third-Party Links and Services

The Platform may contain links to or display data from third-party services. We do not control the privacy practices of independent third parties. Your interaction with a third-party service is governed by that third party's own terms and privacy policy, and we encourage you to review them before providing Personal Data or using the service.

19. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to the Platform, our processing activities, service providers or applicable law. The "Last updated" date at the beginning of the Policy will be revised when changes are made.

Where required by law, we will provide additional notice of material changes or obtain renewed consent where necessary.

20. Contact and Legal Information

Data controller / WhaleScan operator: Liberandum AI FZCO

License number: 46951

Registered address: Building A1, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates

Email: info@whalescan.net/

Product website: <https://whalescan.net/>

For privacy-related requests, please use the email address above and include "Privacy Request" in the subject line where possible.