



UGLYCASH

BFF Trading — Portfolio Privacy Policy

Last Updated: February 17, 2026.

This Privacy Notice for BFF Trading, LLC (“**Company**”, “**we**”, “**us**”, or “**our**”) describes how and why we might collect, store, use, and/or share (“process”) your information when you use the “Portfolio” services, as defined in our User Agreement (“Services”), in the UGLYCASH mobile application (the “App”). By accessing the Services, you accept and consent to the practices described in this Privacy Policy.

Before using our Services, it’s important to carefully read both User Agreement and Privacy Policy, including any notices related to our website or mobile apps.

1. Important information

Purpose of this Privacy Policy

We understand how important privacy is to our users, which is why we only collect the information we need and will not share your personal information with third parties unless it is necessary. Even within the Company, access to your personal information is limited to employees, contractors, and third-party service providers who require such information to manage matters related to the Services, your transactions, and the fulfillment of our third-party relationships.

It is essential that you read this Privacy Policy together with any other privacy notices or fair processing notices we may provide on specific occasions when we are collecting or processing personal data about you. This Privacy Policy supplements those other notices and is not intended to override them.

Changes to the Privacy Policy and your duty to inform us of changes

We may update this Privacy Policy from time to time. When we do, we will update the “Last Updated” date at the top of this policy.

Third-party links

The Services and the App may include links to third-party websites, plug-ins, or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. When you leave our App, we encourage you to read the privacy notice of every website you visit.

2. Specific features of the service

Unlike traditional financial applications or virtual asset wallets, "Portfolio" is built upon public blockchain technology and social connectivity. Therefore:

- **Public on-chain data:** By using our Services, you acknowledge that all transactions and holdings associated with your wallet address are recorded on public, decentralized blockchains. This data is not "collected" by us in a traditional sense, but is publicly available to anyone with blockchain access.
- **Social portfolio visibility:** A core feature of the Services is the ability for users to view investment trends, portfolio compositions, and transaction histories of other users. By linking your wallet to the Services and participating in the social features, you expressly agree that your portfolio data (including assets held and trading activity) may be visible to other users within the "Portfolio" ecosystem to facilitate social investing and community insights.

3. Information we collect

Because "Portfolio" is a non-custodial software service, we do not perform traditional Know-Your-Customer (KYC) identity verification and do not collect government-issued identification unless explicitly stated for specific third-party integrations.

Information you provide to us:

- **Social metadata:** If you choose to create a social profile, we may collect your username, bio, and profile picture.
- **Social logins:** If you register using a third-party social media account (e.g., X, Discord, or Apple), we receive certain profile information as permitted by that provider.
- **Communication data:** Information provided when contacting support or participating in community forums.

Information automatically collected:

- **Public wallet addresses:** We collect the public wallet addresses you link to the Services to provide the portfolio tracking and social feed features, including all transactional data associated with the wallet addresses.
- **Device and usage data:** IP address, device identifiers, operating system, and app usage patterns (e.g., which portfolios you view or "follow") primarily for security, analytics, and service optimization.

4. How do we use the information?

We process your information to facilitate the social and technical functionality of Portfolio, including:

- **To provide the full functionality of portfolio:** To offer you the full functionality of the Services
- **To enable social interaction:** To allow you and other users to follow portfolios, view investment trends, and share transaction data.
- **To manage user accounts:** To authenticate your access via social logins or wallet signatures.
- **To index blockchain data:** To aggregate public on-chain information and present it in a

user-friendly format within the App.

- **To protect the services:** For security monitoring and to ensure compliance with our prohibited activities, as described in the User Agreement.

5. How we share the information?

Your portfolio holdings and transaction activity (linked to your username or wallet address) are shared with other users of the Services as part of the core "social" functionality. Furthermore, all transactions you initiate are broadcast to public blockchains and are permanently visible to the public. We may share data with third-party vendors (e.g., analytics providers or cloud hosting) who perform services on our behalf under strict contractual confidentiality.

6. Security and non-custodial data limitations

We implement reasonable technical measures to protect the data we store. However, you are solely responsible for the security of your own wallet and private keys. The Company shall not be liable for unauthorized access to your information resulting from your failure to secure your device or recovery phrases.

You acknowledge that the Company does not store or have access to your private keys, seed phrases, or recovery passwords. Consequently, we cannot "delete" or "reset" access to your assets, nor can we remove transactions from the public blockchain. Our ability to "delete" data is limited to your social profile and the information stored on our proprietary servers.

7. Users under the age of 18

The Company's Services are not intended for individuals under the age of 18, and we do not knowingly collect information from individuals under 18 without parental consent. If we learn that we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at support@ugly.cash.

8. California privacy rights

California residents may have additional rights regarding our use of their personal information. For more information about your California privacy rights, please visit [this link](#). California residents have the right to request a copy of the personal information collected about them during the past 12 months. California residents will not be discriminated against for exercising their rights under the California Consumer Privacy Act (CCPA). If you request a copy or deletion of your personal information, we may ask you to provide additional personal information to verify your identity before processing your request. To request additional information or to submit a request under the CCPA, please contact us at support@ugly.cash.

9. Data retention

We will retain your personal data and social metadata only for as long as is strictly necessary to fulfill the purposes for which it was collected, including the satisfaction of any legal, regulatory, tax, accounting, or

reporting requirements. Notwithstanding the non-custodial nature of the Services, the Company's internal security policies obligate us to retain certain user information for a period of five (5) years following the termination of the user relationship.

You expressly acknowledge and agree to the following distinction regarding data erasure:

- **Off-chain data:** If you choose to close your account or request data deletion, the Company will terminate the visibility of your social profile at Portfolio. However, we may be legally required to retain certain archived identification logs, social metadata, or communication history for the periods mentioned above.
- **On-chain data:** Because Portfolio interacts with public decentralized blockchains, the Company has no technical ability to delete, modify, or "forget" transaction data recorded on-chain. Your public wallet address and its associated transaction history are permanent records and are not subject to deletion by the Company.

In certain circumstances, we may anonymize your personal data (ensuring it can no longer be associated with you) for research, statistical, or product development purposes. In such instances, the Company reserves the right to utilize this de-identified information indefinitely without further notice to you.

10. Contact information

Please contact our support team if you have any questions, concerns, or comments about this Privacy Policy by emailing us at support@ugly.cash.

To file a complaint or express a concern, please use the contact information above to reach our privacy team. We will respond promptly to let you know when you can expect a further response. Any terms not covered by this Privacy Policy will be governed by the terms of the User Agreement that you agree to when opening your wallet.