

# Privacy Policy

Last Updated: February 7, 2025

At Lightspark Group, Inc. (“Lightspark”, “we”, and “us”) we take your privacy seriously. Please read this Privacy Policy to learn how we treat your Personal Data (as defined below). By using or accessing this website, including its subpages and subdomains (the “Website”) or any of the products, services or applications provided or otherwise made available on, through or in connection with the Website, including the Spark products (collectively, the “Services”) in any manner, or otherwise interacting with us, you hereby acknowledge that you accept the practices and policies outlined below, and you hereby consent that we may collect, use, share and otherwise process your Personal Data as described in this Privacy Policy.

Remember that your use of the Services and the Website is at all times subject to our Website [Terms of Use](#) which incorporates this Privacy Policy by reference. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in our Website Terms of Use.

You may print a copy of this Privacy Policy by clicking [here](#).

As we continually work to improve the Services and the Website (or for any other reason in our discretion), we may need to change this Privacy Policy from time to time. All changes to this Privacy Policy are effective immediately

when we post them here and apply to all access to and use of the Services and the Website, and our processing of your Personal Data, on a go-forward basis. If you use or access any of the Services or the Website after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. If you do not want to agree to any changes to this Privacy Policy, you should not continue to access or use the Services or the Website.

## What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use the Website or any of the Services or otherwise interact with us, or when we process Personal Data that you have made publicly available on the Lightning Network. “Personal Data” means any information that identifies or relates to a particular individual and also includes any information referred to as “personal data,” “nonpublic personal information,” “personally identifiable information,” “personal information” or terms of similar import under applicable data privacy or protection laws, rules or regulations, as and to the extent applicable to your rights and our obligations with respect to such with respect to such data and information.

This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage, nor does it cover our processing of Personal Data of our current, prospective, or former employees or contractors (in each case, in such capacity). Additionally, the Services and the Website may contain links or connections to third-party websites or services of companies we don’t own or control, such as chatbot messaging services. Such third parties may collect your Personal Data through your use of or interaction with such websites or services through the Services or the

Website. We encourage you to read the terms and conditions and privacy policy of each third-party website or service that you access, use, visit or utilize through the Services or the Website.

## Personal Data

### Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect or otherwise process and have collected or otherwise processed over the past 12 months, and the categories of third parties with whom such Personal Data is shared (we also may share such Personal Data as described below under the heading “How We Disclose Your Personal Data”):

#### **Profile or Contact Data:**

Examples of Personal Data We Collect:

- First and last name
- Email address
- Unique identifiers such as usernames, hashed passwords, wallet addresses and organization names
- Reasons for interest in the Website and Services
- Social media handle
- Company or organization information

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers

- Advertising Partners
- Analytics Partners
- Parties You Authorize, Access, or Authenticate

## **Device/IP Data**

Examples of Personal Data We Collect:

- IP address
- Device ID
- Type of device/operating system/browser used to access the Services or the Website

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers
- Analytics Partners

## **Web Analytics**

Examples of Personal Data We Collect:

- Web page interactions
- Referring webpage/source through which you accessed the Services or the Website
- Statistics associated with the interaction between device or browser and the Services or the Website

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers
- Advertising Partners
- Analytics Partners
- Business Partners

### **Geolocation Data**

Examples of Personal Data We Collect:

- IP-address-based location information

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers
- Analytics Partners

### **Other Identifying Information that You Voluntarily Choose to Provide or Make Publicly Available**

Examples of Personal Data We Collect:

- Identifying information in emails, letters, texts, or other communication you send us
- Other identifying information that you provide in the course of using the Services or the Website

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers
- Analytics Partners
- Parties You Authorize, Access, or Authenticate

### **Transaction Data**

Examples of Personal Data We Collect:

- Information about the transactions conducted using the Services, such as the destination, amount, or timestamp of a transaction

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers
- Analytics Partners
- Parties You Authorize, Access, or Authenticate

### **Lightning Network Data**

Examples of Personal Data We Collect:

- Identifying information about yourself, such as an Lightning invoice information or Lightning identifiers that you make publicly available on the Lightning Network

Categories of Third Parties With Whom We Share this Personal Data:

- Service Providers
- Analytics Partners
- Parties You Authorize, Access, or Authenticate

If you do not provide the Personal Data necessary to provide you with the Services or use of the Website, you will not be able to benefit from them.

However, to help us support the principle of data minimization, we ask that you do not provide any Personal Data in the “memo” field of your transactions using the Services. To the extent you do provide any Personal Data by making it publicly available on the Lightning Network or in the “memo” field, you hereby expressly consent to our use and other processing of such Personal Data in accordance with this Privacy Policy.

## Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

When you provide such information directly to us

For example:

- When you create an account or use our interactive tools, the Services and the Website.
- When you voluntarily provide information in free-form text boxes or via chatbot messages through the Services or the Website or through responses to surveys or questionnaires.

- When you send us an email or otherwise contact us.

When you access or use the Website or the Services and such information is collected automatically

For example:

- Through Cookies or Interest-Based Ads (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
- If you use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
- If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- If you instruct a transaction using the Services, we may receive Transaction Data.

When you make such information publicly available on the Spark network

For example:

- When you make Lightning invoice information or Lightning identifiers publicly available on the Lightning Network via Spark



From certain third parties, Vendors and Other Partners

For example:

- We may use analytics providers to analyze how you interact and engage with the Services and the Website, or third parties may help us provide you with customer support.
- We may use vendors and other partners to obtain information to generate leads, create user profiles, facilitate the provision to you of, or otherwise for use in connection with, our Services and the Website.

Advertising Partners

For example:

- We receive information about you from some of our vendors and other partners who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

**Providing, Customizing, Developing and Improving the Services**

- Processing orders or other transactions.
- Providing you with the products, services or information you request, including contacting you to provide updates regarding the Services, the Website, and other related services.
- Meeting or fulfilling the reason you provided the Personal Data to us.
- Providing support and assistance for the Services and the Website.

- Developing and improving the Services, including testing, research, internal analytics, and product development.
- Personalizing the Services, Website content, and communications based on your preferences.
- Investigating or preventing fraud and performing and supporting anti-fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy or protection laws, rules or regulations.

### **Marketing the Services**

- Marketing and selling the Services and other related services.
- Showing you advertisements, including interest-based or online behavioral advertising.

### **Corresponding with You**

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Lightspark or the Services or the Website.
- Sending emails and other communications according to your preferences or that display content that we think will interest you.

### **Meeting Legal Requirements, Enforcing Legal Terms and Other Business Purposes**

- Fulfilling our legal obligations under applicable law, rule, regulation, court order or other legal process.

- Protecting the rights, property or safety of you, Lightspark or another party.
- Enforcing and fulfilling our obligations under any agreements with you.
- Enforcing our Website Terms of Use.
- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.
- Operating the Website and our other IT systems and safeguarding their security.
- Preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Ensuring that our systems are working appropriately, effectively and efficiently.
- Improving the Website, including your browsing experience.
- Verifying your identity, such as when you request access to your Personal Data.
- Conducting internal business administration and recordkeeping.
- Effectuating any potential or actual merger, acquisition, financing, bankruptcy or other transaction.

## How We Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section.

### **Service Providers**

These parties help us host the Website, perform business functions on our behalf or otherwise facilitate the provision of our Services to you. They include:

- Hosting, technology and communication providers.
- Security and fraud prevention consultants.
- Support and customer service vendors.
- Lawyers, accountants, auditors and other professional advisors.

### **Advertising and Other Partners**

These parties help us market and provide the Services and the Website and provide you with other offers that may be of interest to you. They include:

- Ad networks.
- Marketing service providers.
- Financial institution and virtual asset service provider partners.

### **Analytics Partners**

These parties provide analytics on web traffic or usage of the Services and the Website. They include:

- Companies that track how users found or were referred to the Services or the Website.
- Companies that track how users interact with the Services and the Website.

## **Parties You Authorize, Access or Authenticate**

- Other users.
- Single sign-on (SSO) providers (e.g., Google for sign-on, Microsoft).
- Any other parties with which you authorize us to share your Personal Data.

## **Our affiliates or subsidiaries**

### Legal Obligations

We may share any Personal Data that we collect with third parties (including governmental authorities and regulators, courts and law enforcement) in conjunction with any of the activities set forth under “Meeting Legal Requirements, Enforcing Legal Terms and Other Business Purposes” in the “Our Commercial or Business Purposes for Collecting or Disclosing Personal Data” section above.

### Business Transfers

Any or all of your Personal Data that we collect may be transferred to a third party in connection with any potential or actual merger, acquisition, financing, bankruptcy or other transaction.

### Data that is Not Personal Data

We may create aggregated, de-identified and/or anonymized data or information from the Personal Data we collect, including by removing information that makes the data or information personally identifiable to a particular individual. We may use such aggregated, de-identified and/or anonymized data or information and share it with third parties for any purpose (including our lawful business purposes), including to analyze, build and improve the Services and the Website and promote our business.

## Tracking Tools, Advertising and Opt-Out

The Website and the Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and access or use the Website and the Services, analyze trends, learn about our user base, and operate and improve the Website and the Services. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access or use the Website or the Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Website and the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain

Cookies enable you to log into secure areas of the Website and the Services. Disabling these Cookies may make certain features and services unavailable.

- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding the Website and the Services, maintain your preferences over time and recognize you when you return to the Website or the Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors access and use the Website and the Services. They do this by collecting information about the number of visitors to the Website and the Services, what pages visitors view on the Website and the Services and how long visitors view pages on the Website and the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Website's and the Services' content for those who engage with our advertising. For example, Google LLC ("Google") uses Cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Website and the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at [https://www.google.com/privacy\\_ads.html](https://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at

<https://tools.google.com/dlpage/gaoptout/>.

- Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you access or use the Website or the Services and some of the Website or the Services and functionalities may not work.

To explore what Cookie settings are available to you or to modify your preferences with respect to Cookies, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit

<http://www.allaboutcookies.org/>



or

<https://ico.org.uk/for-the-public/online/cookies/>

if you are located in the European Union or the United Kingdom.

### Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Website and the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users of the Website, the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you leave the Website or the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Website or the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

## Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your Personal Data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other Personal Data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure. We cannot guarantee the security of information or data stored on our or our service providers' servers or transmitted via email or through the Services or the Website. You transmit Personal Data to us at your own risk.

## Data Retention

We retain Personal Data about you for as long as necessary to provide you with the Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of Personal Data, we consider who we collected the Personal Data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain data or information in an aggregated, de-identified and/or anonymized form where that information would not identify you personally.

For example:

- We retain your profile information and credentials for as long as you have an account with us.
- 
- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

## Personal Data of Children

As set out in our Website Terms of Use, we do not knowingly collect or solicit Personal Data online from children who are under 13 years of age. We do not knowingly collect or solicit Personal Data from children under 16 years of age; if you are a child under 16 years of age, please do not attempt to register for or otherwise use the Services or the Website or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will take reasonable steps to delete that Personal Data as quickly as possible. If you believe that a child under 16 years of age may have provided us Personal Data, please contact us at [privacy@lightspark.com](mailto:privacy@lightspark.com)

## State Law Privacy Rights

### California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to request information regarding the Personal Data we collected about them and the third parties to whom we disclosed their

Personal Data for the third parties' direct marketing purposes and to prevent disclosure of their Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at

[privacy@lightspark.com](mailto:privacy@lightspark.com)

## Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain of your Personal Data to third parties. You can exercise this right by contacting us at [privacy@lightspark.com](mailto:privacy@lightspark.com)

with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell any Personal Data as "sales" are defined in Nevada Revised Statutes Chapter 603A.

## European Union and United Kingdom Data Subject Rights

### EU and UK Residents

If you are a resident of the European Union ("EU"), United Kingdom ("UK"), Lichtenstein, Gibraltar, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (collectively, the "GDPR") with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, as applicable. “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Lightspark will be the controller of your Personal Data processed in connection with the Services and the Website.

If there are any conflicts between this section and any other provision of this Privacy Policy, this section will control. If you have any questions about this section or whether any of the following applies to you, please contact us at [privacy@lightspark.com](mailto:privacy@lightspark.com)

. Note that we may also process Personal Data of our customers’ end users or employees in connection with our provision of certain services to customers, in which case we are the processor of such individuals’ Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such Personal Data.

## Personal Data We Collect

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect about you.

## Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting or Disclosing Personal Data” section above explains how we use and disclose your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

**Contractual Necessity:** We process the following categories of Personal Data as a matter of “contractual necessity”, meaning that we need to process the Personal Data to perform under our Website Terms of Use, which enables us to provide you with the Services and the Website. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services and the Website that require such data.

- Profile or Contact Data
- Web Analytics
- Professional and Employment Data
- Device/IP Data
- Transaction Data
- We may also anonymize, de-aggregate or de-identify Personal Data to further our legitimate interests.

Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:

- Profile or Contact Data
- Device/IP Data
- Web Analytics
- Geolocation Data
- Identifying information included in the “memo” field of invoices
- Other Identifying Information that You Voluntarily Choose to Provide or Make Publicly Available
- Transaction Data
- Lightning Network Data

We may also de-identify or anonymize Personal Data to further our legitimate interests.

- Examples of these legitimate interests include (as described in more detail above):
- Providing, customizing and improving the Services and the Website.
- Marketing the Services.
- Corresponding with you.
- Meeting legal requirements and enforcing legal terms.
- Evaluating, negotiating and completing corporate transactions, such as business transfers.

Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, to establish, exercise or defend our legal rights for the purposes of legal proceedings, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

## Sharing Personal Data

The “How We Disclose Your Personal Data” section above details how we disclose your Personal Data with third parties.

## EU Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at

[privacy@lightspark.com](mailto:privacy@lightspark.com)

. The various rights are not absolute, and each is subject to certain exceptions or qualifications. Please note that in some circumstances, we may not be able



to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- Access: You can request more information about the Personal Data we hold about you and request a copy of such Personal Data by emailing us at
  - [privacy@lightspark.com](mailto:privacy@lightspark.com)
  - . You can also access certain of your Personal Data by logging on to your account.
  - Rectification: If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by emailing us at
- [privacy@lightspark.com](mailto:privacy@lightspark.com)

- Erasure: You can request that we erase some or all of your Personal Data from our systems.
- Withdrawal of Consent: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such Personal Data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or

disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of the Services or the Website.

- Portability: You can request a copy of your Personal Data in a machine-readable format and request that we transmit it to another controller where technically feasible.
- Objection: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- Restriction of Processing: You can ask us to restrict further processing of your Personal Data.
- Right to File Complaint: You have the right to lodge a complaint about Lightspark's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here:

[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## Transfers of Personal Data

The Services and the Website are hosted and operated in the United States ("U.S.") through Lightspark and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services or the Website, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Lightspark in the U.S. and will be hosted on U.S. servers, and you authorize Lightspark to transfer, store and process your information to and in the U.S. and possibly other countries. In some circumstances, your

Personal Data may be transferred to the U.S. pursuant to a data processing agreement incorporating standard data protection clauses. For additional information regarding the steps we take in connection with transfers of your Personal Data to countries outside of the EU or the UK, please contact us at [privacy@lightspark.com](mailto:privacy@lightspark.com)

## Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect, use and otherwise process your Personal Data or your choices and rights regarding such collection, use and other processing, please do not hesitate to contact us at:

- 855-516-0103
- [www.spark.info](http://www.spark.info)
- [privacy@lightspark.com](mailto:privacy@lightspark.com)
- 8605 Santa Monica Blvd, PMB 64461, West Hollywood, CA, 90069

Prevailing Language. In the event of any discrepancy between the English language version of this Policy and any foreign language translation, the English version prevails. Any other language version of this Policy is provided for convenience only.