

# JOINBASH PRIVACY POLICY

Last Updated: February 2, 2026

Effective Date: February 2, 2026

Version: 1.0

## 1. INTRODUCTION

This Privacy Policy describes how EAO Holdings LLC, a Wyoming limited liability company ("EAO Holdings," "Company," "we," "us," or "our"), collects, uses, discloses, and protects your personal information when you use the JoinBash mobile application and related services (collectively, the "Platform").

JoinBash is an event discovery and social gathering platform that connects event hosts with participants. By using our Platform, you agree to the collection and use of information in accordance with this Privacy Policy.

If you do not agree with this Privacy Policy, please do not access or use our Platform.

This Privacy Policy should be read together with our Data Policy, available at <https://legal.joinbash.com/data-policy.pdf>, which provides detailed technical information about our data handling practices, retention schedules, and security measures.

## 2. INFORMATION WE COLLECT

We collect several types of information to provide and improve our Platform:

### 2.1 INFORMATION YOU PROVIDE DIRECTLY

**Account Information:** Email address, display name, phone number (optional), profile photo, password (encrypted).

**Profile Information:** Biography/bio, location, gender (male, female, or prefer not to say), birthday/date of birth, nickname.

#### Interests and Preferences:

We collect your interests from the following categories to personalize your event recommendations:

- Adventure    - Birthday    - Luxury    - Club- Movie    - Music    - Sport

|              |              |             |           |        |          |
|--------------|--------------|-------------|-----------|--------|----------|
| - Beach      | - Foodie     | - Outdoor   | - Culture | - Tech | - Art    |
| - Networking | - Wellness   | - Nightlife | - Travel  | - Trip | - Indoor |
| - Wedding    | - Graduation |             |           |        |          |

#### **Event Information (if you create events):**

If you create events on the Platform, we process information related to those events, including the event title and description, event location and GPS coordinates, event dates and times, selected event category, pricing information, host-defined eligibility criteria, and any event photos you upload.

#### **Reviews and Feedback:**

- Event ratings (1-5 stars), and Written reviews and comments.

### **2.2 IDENTITY VERIFICATION (KYC) DATA**

To comply with financial regulations and to enable certain features such as withdrawals and payouts, identity verification data is collected through a certified third-party identity verification provider. The information collected may include your full legal name (first and last name), date and place of birth, gender, nationality, government-issued identification documents (such as a passport, driver's license, national ID card, or residence permit), document photographs and validity details, facial photographs used for biometric verification, address information, verification session data, and risk assessment results.

This information is collected only when you initiate identity verification in order to access financial features on the Platform.

### **2.3 FINANCIAL INFORMATION**

When you use payment features on the Platform, we collect information related to your transactions, including transaction history (such as amounts, dates, and transaction types), platform credit balances, payment status information, and payment processor identifiers. We do not store full payment card numbers on our systems.

Payment card details are processed directly by industry-standard, PCI-DSS-compliant payment processors and are subject to the privacy policies and security standards of those processors.

### **2.4 DEVICE AND TECHNICAL INFORMATION**

We automatically collect: Device tokens for push notifications, device type (iOS, Android, Web), device name, app version, operating system version, IP address (during authentication and verification)

### **2.5 USAGE AND ACTIVITY DATA**

We collect information about how you use the Platform: Events you create, attend, or save,

groups you join, notification preferences, app preferences (theme settings), login timestamps, and last activity timestamps

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### **3. HOW WE USE YOUR INFORMATION**

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We use your information for the following purposes:

#### **3.1 Platform Operations:**

We process personal data to operate the Platform, including creating and managing user accounts, authenticating user identities, processing event registrations, facilitating payments and financial transactions, enabling group features and expense splitting, and sending transactional notifications.

**3.2 Personalization:** Recommend events based on your interests, customize your Platform experience, and remember your preferences

#### **3.3 Communications:**

Send push notifications about events and updates, send email notifications (based on your preferences), and respond to your inquiries and support requests

#### **3.4 Safety and Security:**

Verify user identities for financial compliance, detect and prevent fraud, enforce our Terms of Service, and protect Platform integrity

#### **3.5 Legal Compliance:**

We process personal data as necessary to comply with applicable laws and regulations, respond to lawful legal requests and court orders, and fulfill Know Your Customer (KYC) and Anti-Money Laundering (AML) obligations.

#### **3.6 Platform Improvement:**

We process data to analyze usage patterns in order to improve Platform features, to debug and resolve technical issues, and to develop new features and services.

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### **4. LEGAL BASES FOR PROCESSING (GDPR)**

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For users in the European Economic Area (EEA), the United Kingdom, and Switzerland, we process personal data based on the following legal grounds. Processing may be necessary for contract performance, such as providing our services, managing accounts, registering for events, and facilitating payments. Processing may also be required to comply with legal

obligations, including KYC/AML compliance, financial record-keeping, and responding to legal requests.

We may process data based on our legitimate interests, including fraud prevention, Platform security, analytics, and service improvement, provided these interests are balanced against your rights. Additionally, certain processing is based on your explicit consent, such as marketing communications or optional data collection. You may withdraw consent at any time without affecting the lawfulness of processing conducted on the basis of consent before its withdrawal.

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## **5. INFORMATION SHARING AND DISCLOSURE**

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We share your information with the following categories of recipients:

### **5.1 SERVICE PROVIDERS**

We use industry-standard cloud service providers and specialized vendors to operate our Platform, including providers for: Authentication and push notification services, payment processing (PCI-DSS compliant), identity verification (KYC), file and media storage, email delivery, database hosting, aching and performance optimization

These providers process data on our behalf under data processing agreements and are prohibited from using your data for their own purposes.

### **5.2 NO SALE OR SHARING FOR ADVERTISING**

JoinBash does NOT sell, rent, or share your personal information for cross-context behavioral advertising purposes. We do not disclose your personal information to third parties for their direct marketing purposes.

### **5.3 OTHER USERS**

Certain information is visible to other Platform users: Public profile information (display name, profile photo, bio), Events you create (visible to all users or restricted groups), event reviews you post, group memberships (to other group members)

### **5.4 EVENT HOSTS AND PARTICIPANTS**

When you register for an event, event hosts may see your display name and profile photo but other participants may see limited profile information

When you host an event, participants may see your host profile information

### **5.5 LEGAL AND SAFETY DISCLOSURES**

We may disclose your information when required to comply with applicable laws, regulations, or legal processes, to respond to lawful requests from government authorities, to protect our rights, privacy, safety, or property, to enforce our Terms of Service, or to investigate potential violations or fraud.

## 5.6 BUSINESS TRANSFERS

In the event of a merger, acquisition, bankruptcy, or sale of assets, you will be notified before your personal information is transferred to a new entity. You will also be informed of any changes to data practices, and where permitted by law, you may exercise your deletion rights prior to the transfer. The acquiring entity will be bound by the commitments in this Privacy Policy until they provide notice of any changes.

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## 6. DATA RETENTION

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We retain your information for the following periods:

| Data Type                 | Retention Period                             |
|---------------------------|--|
| Active account data       | Duration of account + 30 days after deletion |
| Soft-deleted accounts     | 30-90 days (recovery window)                 |
| Transaction records       | 7 years (financial regulation requirement)   |
| KYC/Identity verification | 5 years after last activity (AML compliance) |
| Event data                | 2 years after event completion               |
| Device tokens             | Until logout or token expiration             |
| Server logs               | 90 days                                      |
| Anonymized analytics      | Indefinitely                                 |

After the retention period, data is permanently deleted or anonymized.

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## 7. DATA SECURITY

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We implement industry-standard security measures to protect your information. Technical safeguards include encryption of data in transit using secure protocols, encryption of stored data at rest, secure password hashing with industry-standard algorithms, support for multi-factor authentication, and rate limiting to protect against common attacks.

### Third-Party Security:

Our service providers maintain industry-recognized security certifications including PCI-DSS for payment processing, ISO 27001, and SOC 2 compliance.

**Operational Safeguards:**

Access controls and authentication, regular security reviews, and incident response procedures

While we strive to protect your information, no method of transmission or storage is 100% secure. We cannot guarantee absolute security.

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**8. YOUR RIGHTS AND CHOICES**

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**8.1 RIGHTS FOR ALL USERS**

Account Settings: Update your profile information, manage notification preferences, change your password, or delete your account at any time.

Communication Preferences: Manage your notifications by opting out of promotional emails, adjusting push notifications, and selecting the types of emails you receive.

**8.2 RIGHTS FOR EEA, UK, AND SWISS USERS (GDPR)**

Under the General Data Protection Regulation (GDPR), you have the right to access your personal data, correct inaccuracies, request deletion, restrict or object to processing your data, receive your data in a structured and machine-readable format, withdraw consent at any time, and request human review of automated decisions.

**8.3 RIGHTS FOR CALIFORNIA RESIDENTS (CCPA/CPRA)**

Under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), California residents have the right to know what personal information is collected about them, request deletion or correction of their personal information, opt out of the sale or sharing of personal information, and not be discriminated against for exercising these rights.

We Do Not Sell Your Personal Information. JoinBash does not sell personal information as defined under the CCPA/CPRA.

**8.4 EXERCISING YOUR RIGHTS**

To exercise any of these rights, contact us at: Email: [privacy@joinbash.com](mailto:privacy@joinbash.com)

We will respond to your request within 30 days (or sooner if required by applicable law). We may need to verify your identity before processing certain requests.

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**9. CHILDREN'S PRIVACY**

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JoinBash is intended for users who are 18 years of age or older. We do not knowingly collect personal information from children under 18.

If you are a parent or guardian and believe your child has provided us with personal information, please contact us at [privacy@joinbash.com](mailto:privacy@joinbash.com). If we discover that we have collected personal information from a child under 18, we will promptly delete that information.

We comply with the Children's Online Privacy Protection Act (COPPA) and do not target our services to children under 13.

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## **10. INTERNATIONAL DATA TRANSFERS**

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JoinBash is operated by EAO Holdings LLC, a company incorporated in the United States (Wyoming). Your personal information may be transferred to, stored in, and processed in the United States and in other countries where our service providers or partners operate.

For users located in the European Economic Area (EEA), the United Kingdom, or Switzerland, we implement appropriate safeguards to protect international data transfers. These safeguards include the use of Standard Contractual Clauses (SCCs) approved by the European Commission, data processing agreements with our service providers, and compliance with applicable data protection laws.

By using the Platform, you acknowledge and consent to the transfer of your information to the United States and other jurisdictions, which may have data protection laws that differ from those in your country of residence.

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## **11. AUTOMATED DECISION-MAKING**

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We use automated processing in the following ways: to suggest relevant events based on your interests and activity (which does not produce legal or similarly significant effects); to apply host-defined eligibility criteria for events, with hosts solely responsible for ensuring compliance with applicable laws (JoinBash does not impose or endorse any discriminatory restrictions); for initial identity verification decisions through automated KYC systems, which you can request human review of; and to detect suspicious activity through automated fraud detection, with all actions reviewed by humans before account restrictions are applied. You have the right to request human intervention, express your point of view, and contest automated decisions that significantly affect you.

## **12. THIRD-PARTY LINKS AND SERVICES**

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Our Platform may contain links to third-party websites or services. This Privacy Policy does not apply to those third-party services. We encourage you to review the privacy policies of any third-party services you access.

## **13. APP STORE PROVIDERS**

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JoinBash is available through Apple App Store and Google Play Store. Please note that Apple Inc. and Google LLC are not parties to this Privacy Policy and are not responsible for the JoinBash application or its content. Your use of the app stores is subject to their respective terms and privacy policies.

## **14. CHANGES TO THIS PRIVACY POLICY**

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We may update this Privacy Policy from time to time. Material changes will be communicated by posting the updated policy on our platform, sending an email to registered users, and displaying an in-app notification.

The “Last Updated” date at the top indicates when the policy was last revised. Your continued use of the platform after changes take effect constitutes acceptance of the revised policy. For material changes, we will provide at least 30 days’ notice before they become effective.

## **15. CONTACT US**

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

EAO Holdings LLC

Email: [privacy@joinbash.com](mailto:privacy@joinbash.com)

Address: 5900 BALCONES DRIVE SUITE 100 AUSTIN, TX 78731

We aim to respond to all inquiries within 30 days.

For users in the European Union, you also have the right to lodge a complaint with your local data protection supervisory authority.

## **16. ADDITIONAL DISCLOSURES**

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### **16.1 DO NOT TRACK SIGNALS**

Our Platform does not currently respond to "Do Not Track" browser signals. However, you can manage your privacy preferences through the settings described in this policy.

### **16.2 COOKIES AND SIMILAR TECHNOLOGIES**

Our mobile application may use local storage and similar technologies to remember your login status, store your preferences,

### **16.3 ANALYTICS**

We may use analytics services to understand Platform usage. This data is used in aggregate form to improve our services and does not identify individual users.

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By using JoinBash, you acknowledge that you have read and understood this Privacy Policy.

EAO Holdings LLC  
A Wyoming Limited Liability Company

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