



FYXO INC

Data Privacy Framework Statement

Effective Date: 04.30.2026 | Version 1.0

Overview

FYXO INC and its affiliates and wholly owned subsidiaries (together, “FYXO”) respect the privacy and confidentiality of personal information entrusted to us by our clients, employees, partners, and other individuals with whom we do business.

FYXO complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. FYXO has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. FYXO has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) regarding the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF.

If there is any conflict between the terms in this Data Privacy Framework Statement and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. FYXO is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

To learn more about the Data Privacy Framework (DPF) program, and to view our certification page, please visit <https://www.dataprivacyframework.gov/>.

This Data Privacy Framework Statement applies to personal information within the scope of FYXO’s Data Privacy Framework certification, which covers the following categories of information:

- Personal information regarding current, former, and prospective employees, contractors, and personnel for the purposes of operating and managing FYXO, performing human resource administration, and maintaining contact with individuals.
- Personal information regarding current, former, and prospective clients and their personnel for the purposes of delivering FYXO services, maintaining ongoing relationships, and performing business development activities.
- Personal information regarding our third parties (e.g., vendors, suppliers, service providers) and their personnel for the purposes of managing and administering FYXO’s business relationships with such third parties.



- Personal information collected from the public to respond to inquiries or provide information requested through our websites or other channels.

Collected personal data may include contact information, name, work and personal email address, mailing address, telephone number, title, company name, IP address, account credentials, and other information you provide or that is generated through your use of FYXO products and services.

For the purposes of this Statement, “personal information” means information that is about, or pertains to, a specific individual and can be linked either directly or indirectly to that individual. Certain personal information covered by FYXO’s DPF certification may be subject to more specific privacy notices, which are also consistent with the principles. In the case of any conflict between such notices and the Principles, the Principles will control.

Notice

FYXO provides notice to individuals regarding (i) the types of personal information collected, (ii) the purposes for which it is collected and used, (iii) the types of third parties to which we disclose personal information and the purposes for doing so, (iv) the right of individuals to access their personal information, (v) the choices and means FYXO offers for limiting the use and disclosure of personal information, (vi) the independent dispute resolution body designated to address complaints, (vii) FYXO’s participation in the EU-U.S. DPF, the UK Extension, and the Swiss-U.S. DPF, (viii) FYXO’s subjection to the FTC’s investigatory and enforcement authority, and (ix) FYXO’s liability in cases of onward transfers to third parties.

Notice is provided through this Statement, FYXO’s general privacy policy, product-specific privacy notices, and other direct forms of communication such as contracts and engagement letters.

Choice

FYXO offers individuals the opportunity to opt out of (i) disclosures of their personal information to a third party (other than an agent processing on FYXO’s behalf and at FYXO’s instructions), and (ii) the use of their personal information for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individual.

For sensitive personal information (information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, genetic data, biometric data for unique identification, or information about a child known to be under 13), FYXO will obtain affirmative express (opt-in) consent before such information is (i) disclosed to a third party or (ii) used for a purpose materially different from the purpose for which it was originally collected or subsequently authorized.

To exercise these choices, please contact us at privacy@fyxo.global.



Accountability for Onward Transfer

Consistent with the Principles, FYXO may transfer personal information to third parties, including transfers from one country to another. FYXO will only disclose an individual's personal information to third parties under one or more of the following conditions:

- The disclosure is to a third-party agent providing services to FYXO, or to the individual, in connection with the operation of our business and is consistent with the purpose for which the personal information was collected (for example, hosting providers, cloud infrastructure, payment processors, identity verification vendors, and customer support tooling).
- FYXO maintains written contracts with such third parties that require them to provide at least the same level of privacy protection as required by the Principles, to use the personal information only for limited and specified purposes consistent with the consent provided by the individual, and to notify FYXO if they make a determination that they can no longer meet their obligation to provide the same level of protection.
- Upon receipt of such a notice, FYXO will take reasonable and appropriate steps to stop and remediate any unauthorized processing.
- With the individual's permission to make the disclosure;
- Where required to meet a legal obligation to which FYXO is subject, including a lawful request by public authorities and national security or law enforcement obligations and applicable law, rule, order, or regulation; or
- Where reasonably necessary for compliance or regulatory purposes, or for the establishment, exercise, or defense of legal claims.

FYXO remains responsible and liable under the principles if a third-party agent that engages to process personal information on its behalf does so in a manner inconsistent with the principles, unless FYXO proves that it is not responsible for the event giving rise to the damage.

Security

FYXO takes reasonable and appropriate measures to protect personal information in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, considering the risks involved in the processing and the nature of the personal information. These measures include administrative, technical, and physical safeguards as well as best practices in the industry for security and data protection.



Data Integrity and Purpose Limitation

FYXO collects and processes personal information only to the extent that it is relevant for the purposes for which it was collected or subsequently authorized by the data subject. FYXO does not process personal information in a way that is incompatible with those purposes. FYXO takes reasonable steps to ensure that personal information is accurate, complete, current, and reliable for its intended use, and retains personal information only for as long as it serves the purposes for which it was collected or subsequently authorized, or as required to meet legal or regulatory obligations.

Access

Individuals whose personal information is covered by this Statement have the right to access the personal information that FYXO maintains about them, and to have such information corrected, amended, or deleted where it is inaccurate or has been processed in violation of the Principles, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy, or where the rights of persons other than the individual would be violated.

Requests for access, correction, amendment, or deletion should be sent to privacy@fyxo.global. FYXO will respond within a reasonable period and in any event within forty-five (45) days of receipt of the request, unless we tell you we are entitled to a longer period under applicable law. Certain personal information may be exempt from such requests in limited circumstances, for example where we are required to retain the information to comply with a legal obligation or to establish, exercise, or defend legal claims.

Recourse, Enforcement, and Liability (Non-HR Data)

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, FYXO commits to resolve Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension, or the Swiss-U.S. DPF should first contact FYXO at privacy@fyxo.global. FYXO has a policy of responding to individuals within forty-five (45) days of an inquiry or complaint.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, FYXO commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension, and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. The services of JAMS are provided at no cost to you. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint.



If your complaint is not resolved by us or by JAMS you may, under certain conditions, have the option to invoke binding arbitration before the DPF Panel. For further information, please see <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf>.

Renewal and Verification

FYXO will renew its EU-U.S. DPF, UK Extension, and Swiss-U.S. DPF certifications annually, unless it subsequently determines that it no longer needs such certification or if it employs a different adequacy mechanism.

Prior to re-certification, FYXO will conduct an in-house verification to ensure that its attestations and assertions about its treatment of personal data are accurate and that it has appropriately implemented these practices. As part of the verification process, FYXO will:

- Review this Statement and FYXO's publicly posted privacy policy to ensure that they accurately describe the practices regarding the collection of personal information within the scope of the certification;
- Ensure that the publicly posted privacy policy informs individuals of FYXO's participation in the EU-U.S. DPF, the UK Extension, and the Swiss-U.S. DPF and where to obtain a copy of this Statement;
- Confirm that this Statement continues to comply with the DPF Principles;
- Confirm that individuals are made aware of the process for addressing complaints and the independent recourse mechanism; and
- Review the processes and procedures for training employees about FYXO's participation in the DPF programs and the appropriate handling of personal data.

FYXO will prepare an internal verification statement on an annual basis.

Modifications

FYXO may update this Statement from time to time by publishing an updated version. We will not update this Statement in contravention of the principles so long as we remain certified to the Data Privacy Framework.

Contact

Privacy inquiries: privacy@fyxo.global

Legal inquiries: legal@fyxo.global

Mailing address: FYXO, 104 West 40th Street, New York, NY 10018, US