

Privacy Policy

Last Revised: August 2, 2026

1. Introduction

This is the privacy policy ("Privacy Policy") that governs how we, StarkWare Industries Ltd. ("Off Market", "we", "our" or "us"), use Personal Information (defined below) that we collect, receive and store about individuals in connection with the use of the website <http://offmarket.cx/> (together with its sub-domains, content and services, the "Site").

We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Site. "Personal Information" means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, name, email address, or other contact information.

General browsing of the Site does not require account registration. However, during our alpha phase, we collect and store the email address you provide in order to register you for access to the Site. We do not collect or store wallet addresses or other account credentials. We do not sell your email address to any third party, and we do not use it for any purpose other than registration and internal product analytics.

2. Terms of Use

This Privacy Policy forms an integral part of our Terms of Use, available at <https://offmarket.cx/terms-of-service.pdf> ("Terms"). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

3. Consent and Modification

You are not legally obligated to provide us Personal Information, and you hereby confirm that providing us Personal Information is at your own free will. By using the Site, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Site. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such changes will be effective upon posting of the revised Privacy Policy on the Site, and your continued use of the Site thereafter will constitute your acceptance of, and agreement to be bound by, those changes. For your convenience, whenever this Privacy Policy is changed, we will update the "last updated" date at the top of this page. We encourage you to periodically check and review this Privacy Policy.

4. What Personal Information We Collect and How We Collect It

We do not require you to provide Personal Information in order to have access to general information available on the Site, and aside from the email address you provide to register during our alpha phase, the Site does not ask for or store your email address or wallet address. We receive and/or collect information from you in the following ways:

- **Log Files.** We may make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the Site, track users' movement around the Site, and gather demographic information.
- **Cookies and Other Tracking Technologies.** Our Site may utilize "cookies", anonymous identifiers and other tracking technologies in order for us to provide our Site and present you with information that is customized for you and in order to track users. A "cookie" is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to recall information such as IP address, device identifier, previously visited websites, access times to our Site and referring URLs, and information about your interaction with our Site such as click behavior and indicated preferences. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.
- **Google Analytics and FullStory.** The Site may use tools such as Google Analytics and FullStory to collect information about how users interact with the Site. These tools collect information such as how often users visit the Site, which pages they visit, what actions they take while on the Site, and what sites or services they used prior to visiting. We use the information we obtain from these tools to maintain, analyze, and improve the Site and our products. We do not combine information collected through Google Analytics or FullStory with Personal Information. Google's ability to use and share information collected about your visits to this Site is governed by the Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>) and the Google Privacy Policy (<https://www.google.com/policies/privacy/>). You may learn more about how Google collects and processes data at <https://www.google.com/policies/privacy/partners/>. You may opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. FullStory's collection and use of information is governed by the FullStory Privacy Policy, available at <https://www.fullstory.com/legal/privacy/>. FullStory may record user interactions with the Site, including mouse movements, clicks, scrolling, and other activity, as well as information about the device and browser used. You may opt out of FullStory's analytics services by following the instructions provided at <https://www.fullstory.com/optout/>.

5. The Way We Use Personal Information

If we collect Personal Information through the Site, then we may use such Personal Information in the following ways:

- We may use your Personal Information to provide and improve our Site and services.
- We may use your Personal Information to contact you and to provide you certain offerings and/or programs that you have registered to or that we think may interest you. Notwithstanding the above, we do not use email addresses collected for registration purposes for marketing or promotional communications.

If we obtain your Personal Information through your visit to our Site, interaction with us, or any other manner, our legal basis for processing your Personal Information is that it is necessary for our legitimate interest in providing and developing our services.

6. How We May Share Your Personal Information

- Your information, including Personal Information, may be shared with our local or foreign subsidiaries or affiliated companies and/or with our third-party service providers and partners for the purpose of storing or processing such information on our behalf, for our business purposes and to provide our Site to you and other users. Such information may be transferred to other countries. We require that these parties agree to process such information in compliance with our Privacy Policy.
- We may disclose your Personal Information or any information you submitted via the Site if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of Off Market, our users, yourself or the public.
- Upon your information being shared with our service providers, we will treat this information according to the terms of this Privacy Policy, and the relevant service provider will treat it according to the terms of its own privacy policy. If you would like to request the deletion of your information that has been disclosed to third parties, or further details about those third parties, please contact us at offmarket@starkware.co.

7. Use of Anonymous Information

We may use Anonymous Information (as defined below) or disclose it to third-party service providers in order to improve our Site and enhance your experience with the Site. We may also disclose Anonymous Information (with or without compensation) to third parties. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our Site.

8. Opting Out

We do not use the email address you provide for registration to send promotional, marketing, or other Site-related emails, and there is nothing to opt out of on that front. If this changes in the future, we will provide an unsubscribe mechanism and update this Privacy Policy accordingly.

9. Choice

At all times, you may choose whether or not to provide or disclose any information. If you choose not to provide optional information, you may still visit and use the Site, but you may be unable to access certain options, programs, or features that involve our interaction with you.

10. Rights You May Have

You may have certain rights in relation to your Personal Information under applicable law. These rights do not necessarily apply to all users of the Site. These include the right to request access to your Personal Information, that it be erased, that its processing be restricted, or that any inaccurate Personal Information be rectified. You may also have the right to object to the processing of your Personal Information, and under certain circumstances to obtain a copy of the Personal Information in machine readable format (portability right). You may also have the right to lodge a complaint with the data protection regulator in your country. If you would like to exercise any of your rights, please contact us at offmarket@starkware.co. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights).

11. Retention of Information

If we obtain information about you through your visit to our Site or interaction with us, we will store that information for as long as is necessary for the purpose(s) for which we collected it and in accordance with applicable law and legitimate business interests. When assessing the data retention period, we take into account the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you would like more information on our retention practices, including how to access, update, or request the deletion of information that is stored on our systems, please contact us at offmarket@starkware.co, detailing your request. We will respond to you within a reasonable time and, in any case, within the time limits established by applicable law.

12. Links to and Interaction with Third-Party Products

The Site may enable you to interact with or contain links to third-party websites, applications, and services that are not owned or controlled by us (each a "Third-Party Service"), including the Polymarket prediction market platform, blockchain networks, and cryptocurrency wallets. Off Market is not affiliated with, and is not responsible for, the privacy practices or content of any such Third-Party Service. When you use the Site to interact with a Third-Party Service, that interaction, including any wallet address you connect and any transaction you submit, occurs directly between you and that Third-Party Service (and, in the case of blockchain transactions, on a public, permanent ledger that we do not operate and cannot alter or delete) and is not information that Off Market collects or stores. Please be aware that any information you provide to, or that is recorded in connection with, a Third-Party Service is governed by that service's own privacy and data practices and is not covered by this Privacy Policy. We encourage you to read the terms and privacy policy of each Third-Party Service that you choose to use or interact with.

13. Children's Privacy

The Site is not structured to attract children under the age of 18 years, consistent with the eligibility requirements in our Terms. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 18 years. If we learn that we have collected Personal Information from a child under 18 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at offmarket@starkware.co.

14. Security

The security of Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use reasonable acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Site, you can contact us at offmarket@starkware.co.

15. Merger, Sale or Bankruptcy

In the event that we are acquired by or merged with a third-party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events.

16. Our California Do Not Track Notice

We may collect information about an individual's online activities over time and across different websites when a consumer uses the Site.

We do not allow third parties to collect personally identifiable information about an individual's online activities over time and across different websites when a consumer uses the Site.

Do Not Track (DNT) is a privacy preference that users can set in certain web browsers. Please note that we do not currently respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

17. Commitment

Protecting your privacy online is an evolving area, and we are constantly evolving our Site to meet these demands. If you have any comments or questions regarding our Privacy Policy, or your Personal Information that we may be storing and using, please contact us at offmarket@starkware.co.