

This Privacy Policy explains how Kuro Network Global LLC ("Kuro Network", "we", "us", or "our") collects, uses, stores, and protects the personal information of clients and visitors who access our website and services. By subscribing to any plan or using our platform, you agree to the practices described in this policy.

Effective Date: Upon subscription activation · Company: Kuro Network Global LLC · Jurisdiction: United States

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## 01 INFORMATION WE COLLECT

PERSONAL DATA COLLECTED AT SIGN-UP & THROUGH USE

When you register, subscribe, or use our dashboard, we collect the following categories of personal information:

<b>EMAIL ADDRESS</b>	Used to identify your account, send verification notices, and communicate essential service information.
<b>PHONE NUMBER</b>	Collected for account security, support contact via WhatsApp or Telegram, and identity verification purposes.
<b>BILLING ADDRESS</b>	Collected to process payments, issue invoices, and satisfy financial compliance requirements.

## COMPANY / BUSINESS NAME

Used to identify the business entity associated with your subscription and to personalise your account records.

## FACEBOOK / META ACCOUNT DETAILS

Required to set up, manage, and maintain your managed ad account infrastructure on the Meta platform. This includes Business Manager IDs and associated asset details.

## PAYMENT INFORMATION

We collect bank transfer details and cryptocurrency wallet addresses for the purpose of processing top-ups and issuing refunds. Full payment credentials are handled via secure third-party processors and are not stored directly on our systems.

## AUTOMATICALLY COLLECTED DATA

- When you visit our website, we may also automatically collect technical data including your IP address, browser type, device information, pages visited, and time spent on site.
- This data is collected via cookies and analytics tools and is used solely for improving our website and services. See Section 03 for full details.

# 02

## HOW WE USE YOUR INFORMATION

### PURPOSES & LEGAL BASIS FOR PROCESSING

We use the personal data we collect strictly for the purposes listed below. We do not use your data for purposes beyond those outlined here without your prior consent.

## SERVICE DELIVERY

To provision, manage, and maintain your managed Meta ad account infrastructure, including setting up Business Managers, Profiles, and ad accounts on your behalf.

## BILLING & PAYMENTS

To process subscription payments, top-ups, refunds, and to maintain accurate financial records in compliance with applicable regulations.

## ACCOUNT SECURITY

To verify your identity, prevent fraud, detect unauthorised access, and protect the integrity of your account and our platform.

## COMPLIANCE MONITORING

To monitor ad account activity for compliance with Meta's Terms of Service and Kuro Network's Acceptable Use Policy, as outlined in our Terms of Service.

## CLIENT SUPPORT

To respond to support requests, resolve disputes, and communicate essential service updates via WhatsApp, Telegram, or Discord.

## PLATFORM IMPROVEMENT

Anonymised and aggregated usage data may be used to analyse platform performance, improve our services, and inform internal business decisions.

## 03

### COOKIES & TRACKING TECHNOLOGIES

#### ANALYTICS & PIXEL USAGE

Our website uses both analytics tools and the Meta Pixel to understand visitor behaviour and measure the performance of our own marketing. The following technologies are in use:

#### GOOGLE ANALYTICS

We use Google Analytics to collect anonymised data about how visitors interact with our website — including pages viewed, session duration, and traffic sources. This data helps us improve site performance and content. Google Analytics data is processed by Google LLC under their own privacy terms.

#### META PIXEL

We use the Meta (Facebook) Pixel to measure ad campaign effectiveness and track conversions on our website. The Pixel may collect data such as your IP address, browser type, and pages visited and sends this to Meta's servers. This data is governed by Meta's Data Policy.

#### ESSENTIAL COOKIES

Our dashboard and website use essential cookies required for core functionality such as session management and security. These cannot be disabled without impacting your ability to use the platform.

#### YOUR CHOICES

You may opt out of Google Analytics tracking by installing the Google Analytics Opt-out Browser Add-on. You can manage Meta Pixel preferences via your Meta account ad settings. Disabling non-essential cookies will not affect your subscription or account access.

## 04 THIRD-PARTY DATA SHARING

OUR COMMITMENT TO YOUR PRIVACY

### WE DO NOT SELL OR SHARE YOUR DATA

- Kuro Network does not sell, rent, trade, or otherwise share your personal data with any third-party organisations for commercial or marketing purposes.
- Your data is used exclusively to deliver the services you have subscribed to and for the internal purposes described in Section 02.
- The only exception is data technically processed by Google and Meta as a result of our use of Google Analytics and the Meta Pixel on our website (see Section 03). These are governed by their respective privacy policies.
- In the event we are required by law, court order, or regulatory authority to disclose personal data, we will comply with applicable legal obligations and notify affected clients where permitted to do so.

## 05 DATA RETENTION

HOW LONG WE HOLD YOUR INFORMATION

We retain your personal data only for as long as is necessary to fulfil the purposes outlined in this policy, or as required by applicable law. The following retention principles apply:

### ACTIVE SUBSCRIPTION

All personal data associated with your account is retained in full for the duration of your active subscription.

### POST-CANCELLATION

Following the end of your subscription – whether through cancellation, non-renewal, or termination – your data will be retained for a period of up to two (2) years for legal, compliance, and dispute resolution purposes.

### PAYMENT RECORDS

Financial transaction records, including top-up history and refund records, may be retained for up to seven (7) years in line with standard financial record-keeping requirements.

### FORFEITED ACCOUNTS

Where an account has been terminated under the non-payment forfeiture clause (see Terms of Service, Section 09), associated account data is permanently deleted and is non-recoverable following the expiry of the 2-week grace period.

### DELETION ON REQUEST

Clients may request early deletion of their personal data at any time (see Section 06). Requests will be processed within 30 days, subject to any mandatory legal retention obligations.

## 06 YOUR RIGHTS

ACCESS, CORRECTION & DELETION

You have the following rights in relation to the personal data Kuro Network holds about you. To exercise any of these rights, contact us using the details in Section 11. We will respond to all valid requests within 30 days.

### RIGHT OF ACCESS

You may request a copy of the personal data we hold about you at any time. We will provide this in a commonly used, readable format.

### RIGHT TO RECTIFICATION

If any personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it without undue delay.

### RIGHT TO ERASURE

You may request that we delete your personal data. We will honour this request unless we are required to retain the data for legal or compliance reasons, in which case we will inform you of the applicable retention period.

### RIGHT TO WITHDRAW CONSENT

Where our processing of your data is based on consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

## 07 DATA SECURITY

HOW WE PROTECT YOUR INFORMATION

Kuro Network takes the security of your personal data seriously. We implement the following technical and organisational measures to protect your information against unauthorised access, loss, or misuse:

- **HTTPS Encryption:** Our dashboard and all client-facing web interfaces are served over HTTPS, ensuring all data transmitted between your browser and our servers is encrypted in transit.
- **Secure Server Storage:** Personal data is stored on secured servers with access controls limiting exposure to authorised personnel only.
- **Third-Party Payment Processing:** Payment information is handled exclusively by secure, PCI-compliant third-party processors. Full card or banking credentials are never stored directly on Kuro Network's systems.
- **Access Controls:** Internal access to personal data is restricted to team members who require it to perform their role.
- **Limitation of Liability:** While we implement robust security measures, no system is entirely immune to risk. Kuro Network cannot guarantee absolute security and accepts no liability for breaches resulting from circumstances beyond our reasonable control.

## 08 COMMUNICATIONS

HOW WE CONTACT YOU

Kuro Network does not send marketing emails or unsolicited commercial communications. All client contact is conducted exclusively through the following channels:

<b>WHATSAPP &amp; TELEGRAM</b>	Our primary support and service communication channels. Used for account updates, support responses, compliance notices, and service announcements.
<b>DISCORD</b>	Used for community support, announcements, and operator communications within the Kuro Network client community.
<b>DASHBOARD NOTICES</b>	Important service updates, policy changes, and account notifications are posted directly within your client dashboard.
<b>NO EMAIL MARKETING</b>	We do not send marketing or promotional emails. Your email address is used solely for account identification and internal records — not for outbound communications.

## 09

### MINIMUM AGE REQUIREMENT

ELIGIBILITY TO USE KURO NETWORK SERVICES

#### 18+ ONLY — SERVICES ARE NOT AVAILABLE TO MINORS

- Kuro Network services are intended solely for individuals who are 18 years of age or older.
- By subscribing or creating an account, you confirm that you are at least 18 years old. We do not knowingly collect personal data from individuals under the age of 18.
- If we become aware that personal data has been submitted by a person under 18, that data will be deleted promptly and the associated account will be closed.
- If you believe a minor has submitted data to us, please contact us immediately using the details in Section 11.

## 10

### POLICY UPDATES

HOW CHANGES WILL BE COMMUNICATED

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, services, or legal obligations. The following applies to all policy updates:

<b>NOTIFICATION METHOD</b>	All material changes to this Privacy Policy will be communicated to active clients via a notice posted within their client dashboard. It is your responsibility to check the dashboard for updates.
<b>EFFECTIVE DATE</b>	Updated policies will display a revised effective date at the top of the document. Continued use of Kuro Network services after a policy update constitutes acceptance of the revised terms.

## PRIOR VERSIONS

Clients may request a copy of a prior version of this Privacy Policy by contacting us directly using the details in Section 11.

# 11

## CONTACT INFORMATION

PRIVACY ENQUIRIES & DATA REQUESTS

For any questions, concerns, or requests relating to this Privacy Policy or the personal data we hold about you, please contact us using the details below. All data-related requests will be handled within 30 days.

<b>COMPANY</b>	Kuro Network Global LLC
<b>GENERAL ENQUIRIES</b>	luca@kuronet.io
<b>SUPPORT</b>	contact@kuronet.io
<b>SUPPORT CHANNELS</b>	WhatsApp · Telegram · Discord
<b>JURISDICTION</b>	United States

## ACCEPTANCE OF PRIVACY POLICY

By subscribing to or continuing to use any Kuro Network service, you acknowledge that you have read and understood this Privacy Policy and consent to the collection and use of your personal data as described herein. This policy is to be read alongside our Terms of Service, which together form the complete agreement between you and Kuro Network Global LLC.

For all privacy-related enquiries, refer to the contact details in Section 11.