

RugZero Privacy Policy

Last updated: 3 October 2026

1. Who we are

RugZero is currently operated by its founders, Prerak Chintalwar and Nadir Khoja, while incorporation of the operating company in Ras Al Khaimah, United Arab Emirates is pending. Until that company is registered, "RugZero", "we" and "us" mean Prerak Chintalwar and Nadir Khoja as joint operators; we will update this policy with the company's name, license number and registered address once registration completes. You can reach us at sales@rugzero.io.

This policy covers rugzero.io, the RugZero console at rugzero.io/app, our invite waitlist, and any emails we send you (together, the "Service"). It explains what personal data we collect, why, who we share it with, and the choices you have.

RugZero is non-custodial software. Your wallet's root credential is your passkey. We never receive it, so we cannot disclose it, lose it or recover it.

2. What we collect

We collect only what we need to run the Service.

Category	What it includes	Where it comes from
Waitlist data	Email address, date of request	You, when you request an invite
Account data	Email address, account ID, signup and login timestamps, passkey public credential ID	You, at signup and login
Wallet data	Your Solana wallet address, the scope of the trading permission you grant, permission changes and revocations	Created at signup through Turnkey; changed by you
Trading and configuration data	Your bot settings, gate and filter configuration, kill-switch state, orders, fills, positions and balances	Your use of the console and the Service's execution on your behalf
Audit trail	A timestamped, append-only record of commands, configuration changes, trades and refusals	Generated by the Service
Technical data	IP address, browser and device type, analytics cookie identifiers, request logs and error logs	Your browser, automatically, when you visit
Communications	Messages you send to support and our replies	You

What we never collect. We never receive or store your passkey, your private key, your seed phrase, or the means to authorize a withdrawal. We do not ask for government ID, and we do not collect payment card details on rugzero.io.

If you do not give us an email address, we cannot send you an invite or create your account.

3. How we use it

Purpose	Data used	Legal basis
Send your invite and account emails	Waitlist and account data	Your consent (waitlist); performance of our contract with you (account)
Create your wallet and run trades you configure	Account, wallet and trading data	Performance of our contract with you
Keep the audit trail you can inspect	Audit trail	Performance of our contract; our legitimate interest in a verifiable record
Keep the Service secure and stop abuse	Technical data, account data	Our legitimate interest in security; legal obligation where applicable
Fix bugs and improve reliability	Technical data, error logs	Our legitimate interest in a working product
Measure traffic on rugzero.io	Technical data, analytics cookie identifiers	Your consent
Answer support requests	Communications, account data	Performance of our contract
Meet legal obligations	Any of the above, as required	Legal obligation

We do not use your data for automated decisions about you as a person. The gates decide on tokens, not on users.

We do not sell your personal data, rent it, or share it with advertisers. We do not send marketing email unless you opt in. Account and invite emails are not marketing.

4. Who we share it with

We share personal data only with providers that help us run the Service, under contracts that limit their use of it to that purpose.

Provider	Role	Data they handle
Turnkey	Wallet key infrastructure (secure enclaves)	Wallet address, passkey public credential, signing policy
GoDaddy	Sending invite and account emails	Email address
Amazon Web Services (AWS)	Hosting the website and servers	Technical data, all stored data
Helius	Reading the Solana chain and submitting transactions	Wallet address, transactions
Google Analytics (Google LLC)	Aggregate site statistics (see Section 5)	Pages viewed, referrer, device and browser type, approximate location, cookie identifiers

We may also disclose data:

- when required by law, court order or a competent authority, after checking the request is valid
- to protect the rights, property or safety of our users, the public or RugZero
- to a buyer or successor if RugZero is merged, acquired or sold, under the same protections as this policy

5. Cookies and analytics

We do not use advertising cookies or ad pixels, and we do not let Google use our site data for advertising.

- **Essential storage.** The console stores a session token in your browser so you stay signed in. The Service does not work without it.
- **Site statistics.** On rugzero.io we use Google Analytics. It sets first-party cookies (such as `_ga`) to count visits, and collects pages viewed, referrer, device and browser type, and approximate location derived from your IP address; Google Analytics does not log or store IP addresses. We load it only after you accept analytics cookies, we have turned off Google Signals and ad data sharing, and we do not run it inside the console at rugzero.io/app. You can withdraw consent at any time from the cookie settings link in the site footer.

Beyond these site statistics, we do not track what you do across the web, and we do not record the console for behavioral profiling.

6. Public blockchain data

Every trade the Service makes from your wallet is recorded on the Solana blockchain. That record is public, permanent and outside our control. Anyone can see your wallet address, its balances and its transactions. We cannot delete or change on-chain data, and the rights in Section 8 do not reach it.

We do not publish the link between your email and your wallet address. If you share your address elsewhere, others may make that link themselves.

7. Retention, security and transfers

Data	How long we keep it
Waitlist email (no account created)	Until you ask us to remove it, or 24 months after your request, whichever comes first
Account, wallet and trading data	While your account is open, then up to 5 years after closure for legal, tax and dispute purposes
Audit trail	Same as account data; it is append-only while your account is open
Technical and error logs	Up to 90 days, longer only while investigating a security incident
Support messages	Up to 3 years after the conversation ends
Site statistics (Google Analytics)	Up to 14 months, per our Google Analytics retention setting

Security. Keys are generated and held in Turnkey's hardware-backed secure enclaves. Our own systems hold only a trading permission scoped to an allow-listed set of programs, which you can revoke. We encrypt data in transit, restrict staff access to what each role needs, and log administrative actions. No system is perfectly secure; if a breach affects your personal data, we will notify you and the relevant authorities as the law requires.

International transfers. We are based in the UAE, and our providers may process data in other countries, including the United States, the European Union and India. Where the law requires it, we use contractual safeguards such as standard contractual clauses for these transfers.

8. Your rights

Depending on where you live (including under the UAE Personal Data Protection Law, India's Digital Personal Data Protection Act 2023 and the EU/UK GDPR), you can ask us to:

- give you a copy of your personal data, including an export of your audit trail
- correct data that is wrong
- delete your data, subject to the legal retention periods in Section 7 and the on-chain limits in Section 6
- stop or limit certain processing, or object to processing based on legitimate interest
- withdraw consent at any time, for example to leave the waitlist
- name a nominee to exercise your rights if you die or become incapacitated (India)

Email sales@rugzero.io from the address on your account. We will reply within 30 days. If you are unhappy with our answer, you can complain to your local data protection authority, or in India to the Data Protection Board of India.

9. Age

The Service is for adults only. You must be at least 18, and of legal age to trade digital assets where you live. We do not knowingly collect data from anyone under 18; if we learn we have, we will delete it.

10. Changes to this policy

If we change this policy, we will update the date at the top. If a change materially affects how we use your data, we will email account holders at least 14 days before it takes effect.

11. Contact

Privacy questions and requests: sales@rugzero.io

Prerak Chintalwar and Nadir Khoja, operators of RugZero (incorporation pending, Ras Al Khaimah, United Arab Emirates)