

Robinhood Non-Custodial Limited

Privacy Notice (Crypto Lending)

Last Updated: June 15, 2026

This Privacy Notice (the "Notice") explains how Robinhood Non-Custodial Limited ("RHNC", "we", "us", or "our") collects, uses, shares, and otherwise processes personal data in connection with your use of our non-custodial wallet and crypto lending services (collectively, the "Services").

RHNC is a company incorporated under the laws of the Cayman Islands. For the purposes of the Cayman Islands Data Protection Act (2021 Revision) (the "DPA"), RHNC is the data controller of your personal data.

Please read this Notice carefully to understand our practices regarding your personal data and how we handle it.

1. No Direct Collection of Personal Data (Onboarding)

Unlike custodial financial platforms, RHNC does not operate a direct user onboarding or identity verification flow, and we do not collect any personally identifiable information (PII) directly from you when you download, set up, or use the Services.

Furthermore:

- No access to wallet keys: your self-custody wallet is fully non-custodial. We do not generate, store, view, or have access to your private keys, seed phrases, or recovery credentials.
- No lending activity visibility: we have no involvement in, or visibility into, your actual lending, borrowing, or trading activities with third-party decentralized finance (DeFi) protocols.

2. Personal Data We Receive from Third Parties (Other Group Entities)

To facilitate the security and operational delivery of the Services, we plan to receive certain personal data about you from other Robinhood group entities, specifically Robinhood Financial LLC ("RHF"), Robinhood Securities LLC ("RHS"), or Robinhood

Crypto, LLC ("RHC").

If you are an existing customer of RHF, RHS or RHC, they may share the following categories of your personal data with RHNC:

- account and eligibility data: account status, whether an active Robinhood user, linkage with wallet / account state;
- contact information: such as your name and email address, state / address information;
- identity and verification data: confirmation of your verified status with RHF, RHS or RHC, selfies and other ID documentation you have previously uploaded, as well as associated risk, fraud or compliance indicators;
- your self-custody wallet address and status;
- communications and preference data: marketing preferences, personal data contained in communications;
- blockchain transaction and on-chain identifier data: transaction status, dates/times, and transaction-history entries for lend / withdraw / export activity;
- financial data: including USDG balances, lent amounts, withdrawals; and
- any additional information that you provide, for example via customer support.

3. How and Why We Use Your Personal Data (Purposes and Legal Bases)

Under the DPA, we must have a valid legal basis to process your personal data. We process the personal data received from our group affiliates for the following specific purposes:

- **Maintain and provide the Services:** account and eligibility data, contact information, identity and verification data, self-custody wallet address and status, blockchain transaction and on-chain identifier data, financial data. Legal basis is performance of a contract.
- **Transaction notification emails:** sending you transactional confirmation and operational notifications related to your on-chain transactions; contact and financial data. Legal basis is performance of a contract.
- **Information security purposes** (including detecting, investigating, monitoring, remediating and/or preventing security or cyber incidents) and detecting and preventing fraud: all personal data types. Legal basis is legitimate interests - to prevent fraud, protect the security of our platform ecosystem, and protect our

business and customers.

- **Legal and regulatory compliance** (complying with applicable laws, regulatory requests, or sanctions screening obligations): all personal data types. Legal basis is legal obligation or legitimate interests to meet our global legal and compliance responsibilities.
- **To provide customer service**: all personal data types. Legal basis is legitimate interests - fulfilling our legitimate interests in customer retention and satisfaction.
- **To send you marketing communications**: contact information, communications and preference data. Legal basis is consent where legally required, or our legitimate interests in sending you communications with content that we think you might be interested in.
- **Product improvement**: account and eligibility data, identity and verification data, self-custody wallet address and status, communications and preference data, financial data, information you provide. Legal basis is consent where legally required, or our legitimate interests in taking steps to improve the Services where necessary.

4. How We Share Your Personal Data

We do not sell your personal data. We may share your personal data with the following categories of recipients:

- **Robinhood group affiliates**: we share information within the Robinhood corporate family (including RHF and RHC) to ensure security, compliance, and unified service delivery.
- **Service providers**: third-party vendors who provide IT, email delivery, system administration, security auditing, and fraud-detection services on our behalf. All such processors are bound by written agreements containing strict data protection obligations.
- **Public blockchain**: transactions made using the RH Self-custodial wallet are recorded on the blockchain and are publicly available. Others can only identify your transactions on block explorers if they know your public address.
- **Professional advisors**: our legal, regulatory, and audit advisors in the Cayman Islands or other relevant jurisdictions.
- **Regulators and authorities**: to comply with court orders, regulatory inquiries, or legal obligations under Cayman Islands or other applicable laws.
- **Substantial corporate transactions**: we may share information about you in connection with a substantial corporate transaction, a merger, consolidation,

reorganization, financing, change in control or acquisition of all or a portion of our business by a third party, or in the unlikely event of a bankruptcy or similar proceeding.

5. International Data Transfers

As a US headquartered company, most of our IT systems are hosted in the United States (including on third party systems). We also share personal data with our group companies in the US. As a result, we will transfer your personal data to this jurisdiction, including to our staff members who are located there.

When we transfer personal data outside the Cayman Islands, we ensure that appropriate safeguards are in place (such as standard contractual clauses or finding that the recipient jurisdiction provides an adequate level of protection) to comply with the eighth data protection principle of the DPA.

6. Data Security and Retention

We maintain robust technical, administrative, and organizational security measures designed to protect your personal data from unauthorized access, loss, alteration, or disclosure.

We will retain your personal data only for as long as is necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. When determining retention periods, we evaluate the nature of the data, potential risk of harm from unauthorized use, and statutory limitation periods.

7. Your Rights

As a data subject under the DPA, you have specific rights regarding how we process your personal data, provided no exemptions apply. These rights include:

- The right to be informed: the right to be provided with clear, transparent, and easily understandable information about how we use your personal data (which is the purpose of this Notice).
- The right of access: the right to request a copy of the personal data we hold about you and receive information on its use.
- The right to cease processing: the right to demand that we stop processing your personal data in certain circumstances (e.g., where the personal data is inaccurate, or where it is being used for direct marketing purposes).
- Rights related to automated decision-making: the right to require that no decision

which significantly affects you is based solely on automated processing of your personal data.

To exercise any of these rights, please contact us using the details provided in Section 8 below.

8. Contact Details

If you have any questions, comments, or complaints about this Privacy Notice or how we handle your personal data, please contact us at:

- Email: privacy@robinhood.com

Right to lodge a complaint: if you are not satisfied with our response or believe that we are processing your personal data in violation of the DPA, you have the right to lodge a formal complaint with the Office of the Ombudsman of the Cayman Islands:

- Address: 5th Floor, Anderson Square, 64 Shedden Road, George Town, Grand Cayman
- Website: www.ombudsman.ky