x2xPro Privacy Policy

Effective: October 19, 2026
Last updated: November 16, 2026

The short version (the full Policy below controls)

- We collect what you give us, what your device and the App tell us as you use it, and public blockchain data linked to your wallet.
- We do not collect or have access to your wallet's private keys or recovery phrase. They are created and stored on your device (or in your browser for the web app) and may be included in your device or iCloud backups. We cannot recover them if you lose them.
- Transactions on the XRP Ledger are public and permanent. We cannot delete them.
- We do not sell your personal information, and we do not share it for advertising across other companies' apps or websites.
- AI features are optional. They use a third-party provider, xAI, and nothing is sent to xAI until you accept a consent screen that names xAI and lists what is sent. You can turn them off in Settings (Section 7).
- We may check names and certain wallet addresses against U.S. government sanctions lists, and we keep compliance records as described in Section 9.
- An earlier version of the App asked some users for identity information, and some of it is still stored (Section 2.2).
- You can ask us to delete your account. Some records we must keep, and your on-ledger data can never be deleted.
- The App is for people 18 or older in the United States.
- This version of the App does not collect your location from your device or from your photos. Photos uploaded through earlier versions of the App may contain location details added by the camera, and some of those photos are still stored (Section 2.4).

1. Who we are and what this Policy covers

1.1 This Privacy Policy explains how x2xPro LLC, a Wyoming limited liability company with its headquarters at 200 S Wilcox St, STE 186, Castle Rock, CO 80104 ("x2xPro," "we," "us," or "our"), collects, uses and shares personal information when you use the x2xPro iOS app (the "App"), the x2xPro web app, the website at x2xpro.com (the "Site"), and our related services (together, the "Services").

1.2 The Services are for adults in the United States. Many users are people acting for a business. This Policy covers their information too.

1.3 This Policy does not cover services you use with x2xPro that other companies run, such as Apple, Google, the XRP Ledger, or digital asset purchase providers. Their own privacy policies apply to them.

2. Information we collect

2.1 Information you give us

- Account and contact information: your name, email address, phone number, login credentials (your password is stored by our authentication provider as a one-way hash; we never see your password), your

profile photo and other profile details you add. If you sign in with Google, we receive your name, email address and profile picture from Google.

- Business information: your company's name and address, your role, your trade or industry, and details you give us about how you plan to use x2xPro. Please do not put sensitive personal information in free-text fields.
- Addresses: street addresses you type in, such as a business, delivery or listing address. The address text you type is sent to Google to look it up and show it on a map (see Section 2.4), and we may store addresses you enter with your account, orders or listings.
- Contacts: if you allow the App to see your contacts, it reads the contact details on your device so you can pick people to pay and find people who already use x2xPro. To find them, phone numbers and emails from your contacts may be scrambled (hashed) and matched on our servers. We may also process and store the contact details you choose to use in the App. We do not read your contacts unless you give permission in iOS.
- Photos and files: photos you take or choose with the camera or photo library, plans, documents, purchase orders, lien waivers, invoices and similar files you create or upload, including information about the other people in them, such as names, business names, addresses, email addresses and wallet addresses. This version of the App does not ask for your location and does not collect location details from your photos. Earlier versions of the App could save location details stored in photos you uploaded, and some of those photos are still stored.
- Marketplace listings: if you post a listing, the details you enter, such as a title, description, photos, price, category and the street address you type for it. Listings, including the address you enter, may be seen by other users of the App.
- Details about other people: when you send a payment or request to someone, the name, contact details or wallet address you enter or choose for them.
- Messages and support: messages you send in the App, support requests, and emails to us.
- AI feature inputs: if you use AI features where available, what you type or upload to them and the responses generated (see Section 7).
- Website forms: if you join our wait list or ask for investor information on the Site, the details you enter, such as your name, email address, phone number, state and message.
- Feedback: survey answers and other feedback you choose to give.

2.2 Identity information and sanctions checks

What the current App asks for. We do not currently run an identity-verification program. The current App does not ask you for a Social Security number, a government ID number, a photo of an ID document, or a selfie. To open an account we ask for your name, email address and phone number, and we may confirm your phone number by sending a one-time code by text message. The Services are intended for people in the United States (Section 14).

Identity information from an earlier version of the App. An earlier version of the App asked some users for identity information. That information included images of a government-issued ID document (front and back), a selfie photo, and related details such as name and address. Some of this information is still stored, and some of the images may also contain location details that the device camera added. We keep it because we may have legal, record-keeping and dispute-related obligations to keep it. We will keep it until we determine we may delete it. We do not use it to verify identities or for any feature of the current App, and we do not sell it or use it for advertising. If you think we hold this kind of information about you, you can ask what we hold and request a copy (Section 12). We will need to verify your identity before we provide any copy, and we may

decline to provide images where the law allows. A request to delete it may be delayed or declined while those obligations apply (Section 9).

Sanctions checks. We may check the names of people invited to the App, and the destination wallet address of sends to addresses outside x2xPro, against U.S. government sanctions lists, including the lists published by the Office of Foreign Assets Control (OFAC). If your name may match a listed person, we may ask you for more information, such as your date of birth, to resolve it. We may keep a record of each check and its result.

If we begin to verify identities, we will update this Policy before we collect that information and tell you what we collect and who processes it.

2.3 Wallet and blockchain information

When you use the wallet, we process your public XRP Ledger addresses and related on-ledger data, such as balances, trust lines, transaction history, destination tags and memos. Data recorded on the XRP Ledger is public and permanent. Anyone can see it, and neither we nor anyone else can change or delete it. When your public address is linked to your account, that on-ledger activity is linked to you.

Payments you send in the App carry a public code on the XRP Ledger that identifies x2xPro as the app used. The code is the same for every x2xPro user and does not name you, but anyone looking at the ledger can see that a payment came from an address using x2xPro.

2.4 Information collected automatically

- Device and identifier information: device model, operating system and version, app version, language, time zone, app and installation identifiers, and a push-notification token. We do not collect your advertising identifier (IDFA), and the App does not show Apple's tracking prompt.
- IP address: your IP address is received by our servers, Google and our other providers in the ordinary course of using the internet and the App.
- Location: this version of the App does not collect your location from your device or from your photos, and it does not ask for permission to use your location. Photos uploaded through earlier versions of the App may contain location details added by the camera, and some of those photos are still stored. If a future version of the App offers to include location with photos, it will be off unless you turn it on, and we will update this Policy before that version is released.
- How the map and address lookup work: when you type a street address, for example for a marketplace listing, the App sends it to Google (Google Maps, Places and Geocoding services) to look the address up, suggest matches and show it on a map. Google receives the address text, the map requests, and your IP address and device information, and handles them under Google's own privacy policy.
- Usage and analytics data: the features you use, screens you view, actions you take, and a device and user identifier, collected through Google Analytics for Firebase. We use it to understand how the App is used and to improve it, not for advertising. It is linked to your account or device.
- Diagnostics: crash reports and performance data, collected through Google Firebase tools.
- Search: what you type into search in the App is sent to our search provider, Algolia, to return results. Algolia also keeps a searchable index of some account and listing details, such as names and company names.
- Biometrics: if you turn on Face ID or Touch ID, iOS checks your face or fingerprint on your device. We do not receive or store your face or fingerprint data.

2.5 Information from other sources

- Public blockchain data from the XRP Ledger.
- Sanctions lists published by government authorities.
- Other users, who may give us information about you, for example when they send you a payment request, purchase order, or lien waiver.
- Digital asset purchase providers, if the App offers a way to buy digital assets and you use it: we may receive the order status, order number, asset, amount and destination address. The provider collects and keeps its own identity and payment details, and we do not receive them.

2.6 Cookies on the Site and the web app

The Site uses only cookies and similar technologies it needs to work, such as to prevent abuse of forms. The Site does not use advertising pixels, advertising cookies or cross-site tracking. The web app uses Google Firebase tools, including usage analytics. We treat a Global Privacy Control signal from your browser as a request to opt out of sale and sharing, although we do neither (Section 6).

3. Information we do not collect

- We do not collect, and we do not have access to, your private keys or recovery phrase, and we will never ask you for them. Your wallet is created and stored on your device (or in your browser's storage if you use the web app). Depending on your device settings, it may also be included in your device or iCloud backups, which Apple, or your browser or computer, controls and not us. Anyone who has your device, a backup, your browser or your recovery phrase may be able to control your wallet. We cannot recover lost keys or recovery phrases.
- We do not collect your payment card or other payment account details for purchases made through a digital asset purchase provider. The provider collects them directly.

4. How we use information

We use personal information to:

- provide the Services: create and run your account, show balances and history, show the marketplace and its map, prepare transactions for you to sign, deliver messages, process orders and documents, and respond to you;
- comply with law and our compliance obligations: screen names and wallet addresses against sanctions lists, review possible prohibited activity, restrict access where required, keep records and answer lawful requests;
- help prevent misuse of the Services: detect and prevent fraud (including payment-redirection scams) and abuse;
- communicate with you: service messages, account alerts and support replies, and product updates you can opt out of;
- improve the Services: understand usage, find and fix crashes and develop features;
- handle requests on the Site, such as wait-list and investor requests, and keep records securities laws require; and
- create aggregated or de-identified information that does not identify you.

5. How we share information

We share personal information only as described here.

- Service providers that process information for us under contract:
- Google (Firebase and Google Cloud) for hosting, databases, file storage, sign-in, phone verification, push notifications, analytics, and crash and performance reports;
- Google (Maps, Places and Geocoding), to look up the addresses you type and show them on a map (see Section 2.4);
- Algolia, for search;
- xAI, for AI features, if you use them (Section 7);
- Zendesk and email tools, for support;
- Dropbox or Google Drive, only if you choose to connect them to the App; and
- Netlify, for the Site and its forms.
- Digital asset purchase providers, if the App offers a way to buy digital assets and you choose to use it. We send what the provider needs to complete your purchase, such as your destination wallet address and the asset and amount you choose. The provider then handles your information under its own privacy policy.
- Other users and counterparties, when you send them a payment, purchase order, lien waiver or message, or when you post a listing they can see. They see what you include, such as your name, company, contact details, signature and wallet address.
- The XRP Ledger, where the details of every transaction you sign are broadcast and recorded publicly and permanently.
- Affiliates: companies that control, are controlled by, or are under common control with x2xPro, which use information as this Policy describes.
- Authorities and others for legal reasons: regulators, law enforcement, courts and others where we believe the law requires it (including sanctions and anti-money-laundering laws), or to answer legal process, enforce our Terms, or protect the rights, property or safety of x2xPro, our users or others. The law may bar us from telling you about some of these disclosures.
- Business transfers, if x2xPro is part of a merger, financing, sale of assets, reorganization or bankruptcy.
- Professional advisers, such as our lawyers and accountants, under duties of confidentiality.
- With your consent or at your direction.

6. We do not sell your information or track you across other companies' apps and sites

We do not sell personal information. We do not share it for cross-context behavioral advertising or use it for targeted advertising. We do not link what we collect with other companies' data to show you ads, and we do not give your information to data brokers. The App does not use your advertising identifier and does not show Apple's tracking prompt. We use Google Analytics for Firebase to understand how the App is used. We do not use it, or any other tool in the App, for advertising, and we do not combine it with other companies' data.

7. AI features

7.1 What they do. Where available in the App, x2xPro's AI features (called "x2xPro AI") may answer your questions and search queries; produce quantity takeoffs and estimates from descriptions, plans and photos; analyze construction photos; translate short job-site phrases between English and Spanish; create or edit

images from a prompt; read a photo or scan of a lien waiver, price sheet or invoice and pull out details; draft a change order from a purchase order; and let you chat with a supply representative's AI Avatar.

7.2 Our AI provider. Our AI provider is currently xAI (SpaceX Super Intelligence LLC, the maker of Grok). Requests go from the App to x2xPro's servers and from there to xAI. xAI acts as our service provider to generate the response. If we change providers, we will update this Section and ask for your consent again before anything is sent to a new provider. xAI has its own privacy practices, which this Policy does not cover.

7.3 What we send. We send xAI what is needed to provide the AI feature you use. Depending on the feature, that may include:

- chat messages and the conversation so far;
- photos, plan pages and other images you attach or upload for analysis or extraction;
- text you ask it to translate, and the languages you choose;
- image prompts and any reference photo you provide to create or edit an image;
- the trade or mode you select;
- unit prices and item descriptions you have saved in your pricing library, when you use Takeoffs or ask for an estimate;
- for a change-order draft: your description of the change, and purchase-order details such as the purchase order number, vendor name, project name, authorized amount, scope of work, and earlier change orders on that order;
- for a supply representative's AI Avatar: your messages, any estimate or takeoff context you include, the representative's name, the company's name, and catalog items and prices; and
- for some photo and document features, a link to the file on our servers, which may include an account identifier.

Please do not upload financial account, card or ID documents to AI features. If you upload a document that has other people's information in it, such as a purchase order, invoice or lien waiver, that information is sent too. Only upload what you are allowed to share.

We do not automatically send xAI your account profile (such as your name, email address or phone number), your wallet addresses, balances or transaction history, or your device location. If you type those details into an AI feature, or they appear on a photo or document you upload, they will be sent.

7.4 Your consent. AI features are optional. Before we send anything to xAI, the App shows a consent screen that names xAI and describes what is sent. Nothing is sent to xAI until you tap Accept. You can withdraw consent at any time by turning off "AI features" in Settings > Security & Privacy. When you do, our servers refuse AI requests for your account, and the rest of the App continues to work. If we change AI providers or the consent terms, we will ask you again.

7.5 How the information is kept. xAI processes your inputs and outputs to give us the response and may keep them under its own terms. Photos and document scans you submit for analysis, and images the AI creates for you, may be stored on our servers while your account is active, and are removed when your account is deleted or sooner if you delete them, subject to Section 9. We also keep limited records of AI use — such as that a request was made, when, and usage amounts — for cost monitoring, security and preventing misuse. We do not sell this information (Section 6).

7.6 Check the output. AI answers can be wrong. See our Terms of Use.

8. Wallet and future wallet options

The App's wallet is created and stored on your device (Section 3). If we offer a different wallet option in the future, such as one supplied by a wallet technology provider, we will update this Policy before it is offered to say what the provider collects, who holds the keys and what that means for you.

9. How long we keep information

- Compliance records. Where we keep records of sanctions screening, compliance reviews and escalations, and the decisions we make about them (including account restrictions), we keep them for at least five years after the record is made or, if later, after your relationship with us ends. Sanctions-screening records, including address checks, are kept for at least ten years.
- Identity information from an earlier version of the App (Section 2.2) is kept while legal, record-keeping or dispute-related obligations may apply, including any obligation to preserve records. It is not deleted when an account is deleted during that time.
- Account and other information. We keep account, business and document information while your account is active. When you delete your account, we delete or de-identify your account profile, contact information, phone number and app data within a reasonable time, except what we are required or permitted to keep, such as compliance records (including your name in them), information needed for legal claims, legal holds, fraud prevention and security. Where your information appears in records other users hold, such as a payment they received from you, we may keep the record and remove or replace your personal details where we can.
- Website requests. We keep wait-list and investor-request information for as long as we need it to handle the request, and for any longer period the law requires.
- Blockchain data. Information on the XRP Ledger is permanent and cannot be deleted by us or anyone else.

10. Security

We use administrative, technical and physical measures designed to protect personal information. No method of storing or sending information is free of risk, and we cannot guarantee that your information will never be accessed, used, changed or disclosed without permission. You are responsible for your device, backups, login details and recovery phrase. Anyone who has your recovery phrase, or access to your device or its backups, may be able to control your wallet, and we cannot recover it for you. If you believe your account is at risk, contact us right away at support@x2xpro.com.

11. Your choices

- Review and update. You can review and update your account information in the App or by contacting us.
- Delete your account. You can delete your account in the App, or ask us by emailing tech@x2xpro.com. Before you delete your account, make sure you have your recovery phrase so you can reach your wallet outside x2xPro. The App asks you to confirm with your password, or with a text-message code if you signed in with your phone number. Deletion may be delayed or refused while you have a payment in progress, or if we are required to keep or review your account records. Deleting your account does not delete your wallet or its on-ledger data. Your wallet keys are not held by x2xPro. They are stored on your device (and may be in its backups, or in your browser for the web app), and you control them with your recovery phrase. We will keep records the law or our compliance obligations require (Section 9).

- Marketing emails. Use the unsubscribe link. We will still send service and account messages.
- AI features. AI features are optional. Nothing is sent to xAI until you accept the consent screen. You can withdraw consent by turning off "AI features" in Settings > Security & Privacy (Section 7).
- Device permissions. You can change camera, photos, contacts, Face ID and notification permissions in iOS settings. Some features will not work without them.

12. Your U.S. state privacy rights

12.1 Depending on where you live, state privacy laws, such as the California Consumer Privacy Act as amended by the California Privacy Rights Act, and the laws of Colorado, Connecticut, Virginia and other states, may give you rights over your personal information. Some of these laws apply only to businesses above certain size or data thresholds. We will respond to the requests below from any U.S. user, whether or not a law requires us to.

12.2 You may ask us to: (a) tell you what personal information we have about you and give you a copy; (b) correct information that is wrong; (c) delete your information, subject to legal exceptions such as our duty to keep compliance records; (d) give you your information in a portable format; and (e) stop selling or sharing it for targeted advertising or certain profiling. We do none of those things (Section 6). We will not treat you worse for making a request. Where the law gives you the right, you may also limit the use of sensitive personal information.

12.3 How to ask. Email tech@x2xpro.com or use the account deletion option in the App. We will confirm it is you by matching information linked to your account. You may use an authorized agent, and we may ask for proof of their authority. We will respond within the time the law requires, usually 45 days. If we decline your request, you may appeal by replying to our decision with "Appeal" in the subject line, and we will answer within the time the law requires. If you are in Colorado and are not satisfied with the result of an appeal, you may contact the Colorado Attorney General.

12.4 Categories of personal information we collect or hold.

Identifiers
Examples: Name, email, phone number, account ID, IP address, device and app identifiers, push token, wallet addresses
Where from: You; your device; the XRP Ledger
Why: Provide the Services; security; compliance
Shared with: Service providers; counterparties you pay; affiliates

Customer records and contacts
Examples: Business name and address, signatures, contact details, contacts you allow us to use
Where from: You; other users
Why: Provide the Services
Shared with: Service providers; counterparties

Commercial and financial information
Examples: Payment and transaction history, orders, lien waivers
Where from: You; the XRP Ledger
Why: Provide the Services; compliance
Shared with: Service providers; counterparties; the public ledger

Internet and app activity
Examples: Screens viewed, features used, search queries, analytics, crash and performance data

Where from: Your device
Why: Improve the Services; prevent misuse
Shared with: Service providers

User content you post
Examples: Listings (text, photos, price, street address you type)
Where from: You
Why: Provide the marketplace
Shared with: Other users of the App; service providers

Photos, files and AI inputs
Examples: Photos, plans, documents, AI chats and images; location details added by the camera to some photos uploaded through earlier versions of the App
Where from: You
Why: Provide the Services and AI features
Shared with: Service providers, including xAI; counterparties you choose

Professional information
Examples: Role, trade, company
Where from: You
Why: Provide the Services
Shared with: Service providers; counterparties

Identity information from an earlier version of the App
Examples: ID document images, selfie photos, name, address
Where from: You (earlier version of the App)
Why: Kept for legal, record-keeping and dispute-related obligations; not used in the current App
Shared with: Service providers that host our data (Google Cloud)

Sensitive personal information
Examples: Account login details; ID document images and selfie photos from an earlier version of the App (Section 2.2)
Where from: You
Why: Provide the Services; account security; legal and record-keeping obligations
Shared with: Service providers

We do not sell or share (for cross-context behavioral advertising) any of these categories.

13. Children

The Services are for people 18 or older and are not directed to anyone under 18. We do not knowingly collect personal information from anyone under 18. If you think a minor has given us information, contact us and we will delete it.

14. Eligibility and where information is processed

The Services are intended for users in the United States. That is an eligibility requirement for using the Services. We are based in the United States, and we expect your information to be processed here. Our service providers, including Google, may also process it on servers elsewhere, and our contractors, some of whom are outside the United States, may have limited access to it as needed to build and support the Services.

15. Third-party services and links

Apple, Google, xAI (our AI provider, Section 7), digital asset purchase providers, the XRP Ledger and other services linked from the Services have their own privacy practices, which this Policy does not cover. Please read their policies.

16. Changes to this Policy

We may update this Policy. If we make a material change, we will tell you by email or in the App before it takes effect. The "Last updated" date at the top shows when it last changed.

17. Contact us

x2xPro LLC
200 S Wilcox St, STE 186
Castle Rock, CO 80104

Privacy requests: tech@x2xpro.com
Support and general questions: support@x2xpro.com