

Privacy Policy

Version 1 — effective 5 October 2026

1. Data controller

Winastar Consulting FZ LLC (RAKEZ licence no. 46000346, CWEP0706, Compass Building, Al Shohada Road, Al Hamra Industrial Zone-FZ, Ras Al Khaimah, United Arab Emirates) is the controller of the personal data collected through the website neural-bet.com, the Neural Bet Telegram bot and the mini-application (the "Service").

2. Data we collect

- Telegram account data: numeric Telegram ID, username, display first name, app language.
- Wallet data: public addresses of wallets created or connected for you, Tron address where applicable, history of deposits, withdrawals and transfers (public on-chain data).
- Activity data: balances, arbitrage results attributed to your account, acceptance of the Terms (version, timestamp), referrals.
- Technical data: IP address and country derived from the IP when opening the mini-application, device and browser type, security logs.
- Card payment data (if you use this method): processed by our payment provider; we never receive your card number, only a payment confirmation and the amount.

3. Purposes and legal bases

- Providing the Service (account and wallet creation, execution of the arbitrage mandate, credits and withdrawals) — performance of the contract.
- Security, fraud and abuse prevention, compliance with our legal obligations (including anti-money-laundering) — legal obligation and legitimate interest.
- Support and Service communications (Telegram notifications for deposits, results, withdrawals) — performance of the contract.
- Aggregated usage statistics (by country, by language) to improve the Service — legitimate interest.
- Referral and partner programme — performance of the contract with referrer and referee.

4. Recipients

Your data is accessible to authorised staff of Winastar Consulting FZ LLC and to the providers strictly necessary for the Service: Telegram (messaging), blockchain infrastructure and hosting

providers, the card payment provider, and the prediction-market platforms on which the algorithm operates (no identifying data is transmitted to them). We never sell your data.

5. International transfers

The controller is established in the United Arab Emirates; the Service's servers are located in the European Union. Where data is transferred outside your country, we implement appropriate safeguards (contractual clauses, technical security measures).

6. Retention

- Account and activity data: for the duration of the relationship, then 5 years after closure for our legal and accounting obligations.
- Acceptances of the Terms: for the duration of the relationship and 5 years thereafter, as evidence.
- Technical logs and IP addresses: 12 months maximum.
- On-chain data: public and immutable by nature; we cannot erase it from the blockchain.

7. Security

Encryption of keys and sensitive data at rest, restricted and logged access, hardened servers, transaction monitoring. No transmission over the Internet is entirely secure; you remain responsible for the security of your Telegram account and devices.

8. Your rights

Under UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data and, if you reside in the European Union or the European Economic Area, the General Data Protection Regulation (GDPR), you have the right to access, rectify, erase, restrict, object to and port your data, and to withdraw your consent at any time. You may exercise these rights by contacting us via Telegram support (@neuralbetsupport). You may also lodge a complaint with the competent supervisory authority of your country of residence.

9. Minors

The Service is restricted to adults. We do not knowingly collect data relating to minors.

10. Changes

This policy may be updated; the current version is published on neural-bet.com with its date. In case of material changes, you will be informed via the Telegram bot.