Privacy Notice

Last update 9/9/2021

Hacken OÜ more than others understands the value of privacy and security. This Privacy Notice is here to help you understand what your personal data is collected, stored and used, and what happens to it, when you use our website.

In this Privacy Notice we answer the following questions:

Who are we?

What does this Privacy Notice cover?

What data do we collect and why?

How long do we keep your data?

Do we share data with third parties?

Do we do data transfer outside the European Economic Area?

Do we use cookies?

What rights do I have regarding my data?

How do we update Privacy Notice?

1. Who are we?

We are **Hacken OÜ**, located at Kai tn 1-5M, Tallinn city, Harju county, 10111, Estonia, registration code: 14351915. Hereinafter, Hacken OÜ, will be referred to as "we" and "our".

We are the controller of your personal data, so we determine what, for what purpose and how your personal data will be processed.

If you have any questions, you can contact us by sending an email support@hacken.io. You can also send us a letter at the address: Kai tn 1-5M, Tallinn city, Harju county, 10111, Estonia.

2. What does this Privacy Notice cover?

This Privacy Notice applies to our Website and forms.

In addition, we can get some data from sources that have their own privacy notices: apps <u>App iOS</u>, <u>App Android</u>, data from social media <u>Medium</u>, <u>Telegram</u>, <u>Twitter</u>, <u>LinkedIn</u>, <u>YouTube</u>, resources clutch.co, exmo.com.

3. What data do we collect and why?

The data we process is divided into two categories: technical information and data that is provided to us by visitor and user.

Technical information. When you visit our website, some data is collected automatically. We need technical data to operate, maintain, and improve our website. This includes data such as IP address, UTM parameters, geolocation, device type, browser type and data about your interaction with the website - session ID.

Data are provided to us by the following data subjects:

- **Visitors** all persons who visit our website.
- Users visitors who filled out at least one of our forms.
- **Crypto holder** person who buys HAI.

Visitors	Users	Crypto holder
Only technical information	We can collect: Full Name, Email, Telegram, Company Name/Fund, Your Role (Founder / CEO / Investment Manager), Phone Number, information from the answer to an open-ended question	We receive: wallet ID amount of HAI transaction data history of transactions

- Example of open-ended question: "why you want to join Hacken Foundation".
- Transaction data includes: date, time, sum in hryvnias.

Data provided by third parties or another of our resources. Information we can get from apps App iOS, App Android, data from social media Medium, Telegram, Twitter, LinkedIn, YouTube.

Once again, detailed about what personal data we collect:

Type of data	Description of data	Legal basis	Reasons for processing		
Visitors					
Automatically collected data	Technical information; Session ID.	Legitimate interest	Website operation; Analytics; Statistics.		
Crypto holder					
Buying cryptocurrency	wallet ID amount of HAI transaction data	Performance of the contract	selling tokens		

Automatically assigned data	history of transactions	Performance of the contract	selling of digital assets
	Users		
You sign up for a marketing	email.	Legitimate interest	marketing
You use 'Cross- Chain Bridge"	information "from" and "to"; generated payment address.	Performance of the contract	provide a service
You fill out the "Join" form	Full Name; Email; Telegram; Company Name.	Performance of the contract	provide a service
You fill out the "Partner" form	Company / Fund; Name; Role (Founder / CEO / Investment Manager); Email; Telegram; Phone number; Why do you want to join Hacken Foundation?	Performance of the contract	provide a service
You connect the wallet	wallet data	Performance of the contract	provide a service
	Data provided by third	d parties	<u>'</u>
You contact us	email; Name; Photo; Other information that may come to us through your email or account.	Legitimate interest	marketing, support
You connect with us through social media	Name; photo; other information that can be obtained via Twitter, Telegram, Medium, YouTube, LinkedIn	Legitimate interest	marketing, support

You use App iOS	email;	Performance of	provide a service
or App Android	name;	the contract	
	photo;		
	other information that may		
	come to us through your email		
	or account		

Pay your attention. We knowingly **do not process** the personal data of users under the age of 18 without consent from legal representative(s). If you are such a user, or you are the legal representative of the user, please let us know by email support@hacken.io.

4. How long do we keep your data?

We store **user data** during the use of our services and for 3 years afterwards.

Data processed based on your consent we are processing during the performance of the contract/while your interaction with our service and 24 months after **or** until you withdraw your consent.

We store technical data (visitor data) for up to two years.

You can exercise your right to delete your data. In this case, your data will be deleted from our servers within 30 days of your request.

Note: the data concerning your crypto transactions is stored and can't be deleted due to the nature of the blockchain.

The length of time we can retain **data from social media and the platform** is determined by policies Twitter, Telegram, Medium, YouTube, LinkedIn.

5. Do we share data with third parties?

We use your personal data to perform a contract and for communication between us and the user. We use and transfer your personal data in measures which are needed to perform a contract. Also, we transfer your data on the following grounds:

Consent. We transfer your personal data based on your explicit consent.

Compliance with the law. We will disclose your personal data to third parties to the extent that it is necessary:

- to comply with a government request, court order, or applicable law;
- to prevent unlawful use of our website or violation of the Terms of Use of our website and our policies;
- to protect against claims of third parties;
- to help prevent or investigate fraud.

Transfer to third parties: We transfer your personal data to third parties on the basis of a public offer for processing on our behalf, subject to technical and organizational measures to protect your personal data.

6. Do we do data transfer outside the European Economic Area?

The personal data we collect is stored on Google Cloud servers. By default, the data is stored in Ukraine, but we may need to process your personal data in another country.

7. Do we use cookies?

We don't use cookies at our website.

8. What rights do I have regarding my data?

You, as subjects of personal data, have the following rights:

- The right to access information. You can request an explanation of the processing of your personal data.
- The right to portability. You can request all the data that you provided to us, as well as request to transfer data to another controller.
- The right to restrict processing. You may partially or completely prohibit us from processing your personal data.
- The right to file complaints. If your request was not satisfied, you can file a complaint to the regulatory body.
- The right to be forgotten. You can send us a request to delete your personal data from our systems, unless there is a legal requirement to keep it.
- The right to withdraw consent. For data that you have previously consented to, you can always withdraw your consent and we will stop processing it.

To exercise your rights, write us an email at support@hacken.io. We will answer you as soon as possible.

If your request was not satisfied, you can file a complaint to the regulatory body — the Data Protection Inspectorate, at info@aki.ee or write a letter to 39 Tatari St., 10134 Tallinn.

9. How do we update Privacy Notice?

This Privacy Notice and the relationships falling under its effect are regulated by the GDPR. Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on our website. If significant material changes are made that affect your privacy and confidentiality, we will notify you by email or display information on the website and ask for your consent.