

Privacy Policy

Effective date:

This Privacy Policy (this "Policy") applies to the websites located at https://*****.protocol.hi.com/ (the "Website") and any services, functions, features or content made available on the Website from time to time (together with the website, the "Site") provided by hi Foundation LTD ("we," "us" or "our"). It describes how we collect, use, and disclose Personal Information that we obtain from Users of the Site, and how we use and disclose that information. For purposes of this Policy, "Personal Information" refers to information supplied by a User from which the identity of such User may be directly or indirectly determined.

By accessing and using the Site, you agree that your Personal Information will be handled as described in this Policy and the Terms and Conditions applicable to the Site (the "Service Agreement"); capitalised terms used herein shall have the same meaning as set forth in the Service Agreement.

1. The Information We Collect About You and How We Collect It

We collect and process Personal Information about you directly from you when you submit such information as a part of the communications to us, including but not limited to your submission of any application form or any Bug Bounty, as well as automatically through your use of the Site.

2. Information We Collect Directly From You.

Communications with Us: We collect information you give us during any support and feedback communications via email or when you contact us through other contact forms on the Site. We use this information to respond to your inquiries, provide support and improve our Site.

Please note that if you are acting as an Authorised Individual on behalf of a User and are providing Personal Information for such User, you are responsible for ensuring that you have all required permissions and consents to provide such Personal Information to us for use in connection with the Site and that our use of such Personal Information you provide to the Site does not violate any applicable law, rule, regulation or order.

3.Information We Collect Automatically.

When you use the Site, our servers automatically record information using cookies and other tracking technologies, including information that your browser sends whenever you visit the Site or your mobile application sends when you're using it. This log data may include your Internet Protocol address, the address of the web page you visited before coming to the Site, your browser type and settings, the date and time of your request, information about your browser configuration and plug-ins, language preferences, and cookie data. Such log data is not routinely deleted.

In addition to log data, we may also collect information about the device you use for the Site, including what type of device it is, what operating system you're using, device settings, unique device identifiers, and crash data. Whether we collect some or all of this information may depend on what type of device you're using and its settings.

We may combine this information with other information that we have collected about you, including, where applicable, your name, email address, and other Personal Information.

Geolocation. If you have provided permission through your mobile device to allow us to collect location information through a mobile application, we may obtain your physical location information in terms of latitude and longitude from technologies like GPS, Wi-Fi, or cell tower proximity. You are able to withdraw your permission for us to acquire such physical location information from your mobile device through your mobile device settings, although we do not control this process. If you have questions about how to disable your mobile device's location services, we recommend you contact your mobile device service provider or the mobile device manufacturer.

4.How We Use Your Information

We use your information, including your Personal Information, for the following purposes:

- To provide our Site to you, to facilitate communications on and using of the Site, to communicate with you about your use of our Site, to respond to your inquiries and for other service purposes;
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- To tailor the content and information that we may send or display to you, to offer location customization, and personalised help and instructions;
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- To better understand how users access and use the Site, both on an aggregated and individualised basis, in order to improve our Site and respond to user desires and preferences, and for other research and analytical purposes.

5. How We Share Your Information

- **Affiliates.** We may disclose the information we collect from you to our affiliates or subsidiaries solely for the purpose of providing the Site to you; however, if we do so, their use and disclosure of your personally identifiable information will be maintained by such affiliates and subsidiaries in accordance with this Policy.
- **Service Providers.** We may disclose the information we collect from you to third-party vendors, service providers, contractors or agents who perform functions on our behalf, provided such third parties have agreed to only use such information to provide services to us.
- **Business Transfers.** If we are in negotiations with, or are acquired by or merged with another entity, if substantially all of our assets are transferred to another entity, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other entity.
- **In Response to Legal Process.** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal processes, such as in response to a warrant or request or subpoena.
- **To Protect Us and Others.** We also may disclose the information we collect from you if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Service Agreement or this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and De-Identified Information.** We may collect, process, analyse and share aggregate or de-identified information about users with third parties and publicly for product development, marketing, advertising, research or similar purposes.

6. Our Use of Cookies and Other Tracking Mechanisms

We and our third-party service providers use cookies and other tracking mechanisms to track information about your use of our Site. We may combine this information with other Personal Information we collect from you (and our third-party service providers may do so on our behalf).

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site, while others are used to enable a faster log-in process or to allow us to track your activities whilst on or at our Site.

Third Party Analytics. We use automated devices and applications to evaluate usage of our Site, such as Cookie3 Analytics, which we use for analytical and marketing purposes.

Cookie3 Analytics is a tool used to collect information about our user behaviour on the Site. It is used to create a user profile. To learn more about the processing of data by Cookie3 Analytics, please refer to the Cookie3 Privacy Policy. We also may use other analytic means to evaluate our Site. We use these tools to help us improve our Site, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your Personal Information with these third parties.

7. Third-Party Links

Our Site may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

8 Security of Your Personal Information

While there is an inherent risk in any data being shared over the internet, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, damaged, or accessed in an unauthorised or unlawful way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. Please be aware that despite our efforts, no data security measures can guarantee 100% security. Therefore, all Users (including their Authorised Individuals) of the Site must comply with the security requirements in the Terms and take the following additional steps to help ensure the security of their Personal Information and the access to the Site:

- You should install antivirus, anti-spyware, anti-malware and firewall software on your personal computers and mobile devices;
- You should update operating systems, anti-virus, anti-malware and firewall products with security patches or newer versions on a regular basis;
- You should remove file and printer sharing in computers, especially when they are connected to the internet;
- You should make regular backups of your critical data;
- You should consider the use of encryption technology to protect highly sensitive or confidential information;
- You should completely log off and clear your browser cache after finishing each online session with the Site;
- You should not install software or run programs of unknown origin;

- You should delete junk or chain emails;
- You should not open email attachments from strangers;
- You should not disclose personal, financial, or credit card information to little-known or suspect websites;
- You should not use a computer or a device that cannot be trusted; and
- You should not use public or internet café computers to access secure online services.
- You should immediately notify us at contact@hi.com if you become aware of any unauthorised use of your Personal Information. We are not responsible for any lost, stolen, or compromised Personal Information or for any activity arising from the unauthorised use of your Personal Information.

9. Rights of access, correction, and deletion

You can access, edit, update, or delete your Personal Information we have collected at any time by emailing us at dataprivacy@hi.com. We will respond to your requests within a reasonable period of time, but no later than the time period required by law.

Please note that notwithstanding the foregoing, there may be circumstances in which we are unable to accommodate a request to edit, update, access, or delete the Personal Information. This includes but is not limited to:

- any basis where such request can be denied under applicable law;
- where we need to retain the information to comply with federal, state, or local laws or for accounting or tax purposes;
- where we need to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by EU, federal, state, or local authorities;
- where we need to cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate EU, federal, state, or local law;
- where we need to retain information to exercise or defend legal claims

- where the information contains legal privilege or proprietary information of another party; or
- where complying with the request would compromise others' privacy or other legitimate rights.

If we determine that we cannot respond to any request in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before responding to any request under this provision, including complying with any applicable legal requirement for verifying your identity.

10. Transfer of Information

Please note, we may store your Personal Information on servers located in the regions where our offices are located. If such jurisdiction is outside your jurisdiction of residence, you consent to the transfer of your Personal Information to such jurisdiction for purposes of providing the Site to you, even if such other jurisdiction has less protections for Personal Information than your jurisdiction of residence.

hi Protocol may transfer your data outside of the European Economic Area ("EEA"). hi Protocol has significant suitable safeguards to ensure that such transfer is carried out in compliance with applicable data protection rules, except where the country to which the data is transferred has already been determined by the European Commission to provide an adequate level of protection.

Where hi Protocol transfers personal data to affiliates or service providers, hi Protocol relies on the standard contractual clauses approved by the European Commission and complying with the GDPR or the applicable data protection rules.

Retention

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

- Here are some exemplary factors which we usually consider when determining how long we need to retain your personal data:
- in the event of a complaint;

- if we reasonably believe there is a prospect of litigation in respect to our relationship with you or if we consider that we need to keep information to defend possible future legal claims (e.g. email addresses and content, chats, letters will be kept up to 10 years following the end of our relationship, depending on the limitation period applicable in your country);
- to comply with any applicable legal and/or regulatory requirements with respect to certain types of personal data:
- under the EU Anti-Money Laundering legislation (Anti-Money Laundering Directives) we are obliged to retain your personal data for a period of 5 years after the end of the relationship between us as a company and you as a customer; this period may be further extended in certain cases if so provided by and in accordance with the applicable legislation;
- if information is needed for audit purposes and so forth;
- in accordance with relevant industry standards or guidelines;
- in accordance with our legitimate business need to prevent abuse of the promotions that we launch. We will retain a customer's personal data for the time of the promotion and for a certain period after its end to prevent the appearance of abusive behaviour.

Please note that under certain condition(s), you can ask us to delete your data: see your legal rights below for further information. We will honour your deletion request ONLY if the condition(s) is met.

Children Under 18

Our Site is not designed for children under 18. If we discover that a child under 18 has provided us with Personal Information, we will delete such information from our systems.

Contact Us

If you have questions about the privacy aspects of our Site or would like to make a complaint, please contact us at dataprivacy@hi.com

Changes to this Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on the Site. If we make any changes to this Policy that materially affect our practices with regard to the Personal Information we have previously collected from you, we

will endeavour to provide you with notice in advance of such change by highlighting the change on our Site or providing a push notification through the Site (you should make sure your Site settings allow for such push notifications).