

## Hardware Wallet Privacy Policy

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Thank you for joining Hardware Wallet. We are HWLT FZE, a Limited Liability Free Zone Establishment under the DWTCA Company Rules and Regulations limited, based at <https://hw.1inch.io> (“Website”) (“Hardware Wallet”, “we”, “us”, “our”). Hardware Wallet is in the process of building a crypto hardware wallet (“1inch Hardware Wallet”). This Privacy Policy may be short since we have begun our activities not so long time ago. Still, we are aiming to do our best when treating your privacy and sincerely wish you to understand what data we collect and use about you. After all, in this Privacy Policy, we are describing our data collection practices and your rights to access, correct, or restrict our use of your personal data.

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use the Website. To make it simple, as of now, our Privacy Policy also applies to prospective customers of our business and enterprise products.

**By using the Website, you agree to the terms of this Privacy Policy.** You shouldn’t use the Website if you don’t agree with this Privacy Policy or any other agreement that governs your use of the Website.

### 1. What Data We Get

We collect certain data from Website visitors directly; namely the information Website visitors enter themselves.

#### 1.1. Data You Provide to Us

We may collect different data from you through Website. Below are some examples to help you better understand the data we collect.

When you use our Website, we collect any data you provide directly, including:

- **Waiting List:** We may collect your name, email address and postal address (residing country) when you fill out the respective info in the “waiting list” section on our Website to be notified when 1inch Hardware Wallet goes on sale.
- **Sweepstakes, Promotions, and Surveys:** We may invite you to complete a survey or participate in a promotion (like a contest or challenge), either through our Websites or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your name, email address, postal address, and date of birth. That data is subject to this Privacy Policy unless otherwise stated in the official rules of the promotion or in another privacy policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. To receive a reward, you may be required to allow us to post some of your information publicly (like on a winner’s page). Where we use a third-party platform to administer a survey or promotion, the third party’s privacy policy will apply.

- **Communications and Support:** If you contact us for support or to report a problem or concern, we collect and store your contact information, messages, and other data about you like your name, email address, messages, location, and any other data you provide or that we collect through automated means (which we cover below). We use this data to respond to you and research your question or concern, in accordance with this Privacy Policy.

The data listed above is stored by us and associated with you.

## 1.2. Data We Collect Through Automated Means

When you access Website (including browsing content), we collect certain data by automated means, including:

- **System Data:** Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types;
- **Usage Data:** Usage statistics about your interactions with Website, including content accessed, time spent on the Website, click data, date and time, referrer, and other data regarding your use of our Website;
- **Approximate Geographic Data:** An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.

The data listed above is collected through the use of server log files and tracking technologies, as detailed in the “Cookies and Data Collection Tools” section below. It is stored by us and associated with your account.

## 1.3. Data Retention Period

We maintain your personal data exclusively within the time needed to follow prescribed herein legal or business purposes. When we no longer need your personal data, we securely delete or destroy it. Aggregated data, which cannot identify a device/browser (or individual) and are used for reporting and analysis, are maintained for as long as commercially necessary.

Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention.
- Complying with legal or regulatory requirements.
- Ensuring the continuity of our Website.

## 1.4. International Transfers

We may be entitled to transfer your personal or non-personal data to third parties abroad for the purposes of data processing. As personal data processors, they are obliged to protect data privacy to the same extent as we do. We choose the processors carefully to ensure compliance with applicable laws.

For the sake of clarification, we plan to transfer your personal or non-personal data only to the countries where we operate as a business.

## 1.5. Supervisor Authority Oversight

If you are a data subject whose data we process, you may also have the right to lodge a complaint with a data protection regulator in one or more of the European Union member states. [Here](#) you can find a list of data protection authorities in Europe.

## 2. How We Get Data About You

We use tools like cookies, web beacons, and similar tracking technologies to gather the data listed above. Some of these tools offer you the ability to opt out of data collection.

### 2.1. Cookies and Data Collection Tools

We use cookies, small text files stored by your browser, to collect, store, and share data about your activities across Website. They allow us to remember things about your visits to the Website. To learn more about cookies, visit <https://cookiepedia.co.uk/all-about-cookies>.

Hardware Wallet and service providers acting on our behalf (like Google Analytics and third-party advertisers) use server log files and automated data collection tools like cookies, tags, scripts, customized links, device or browser fingerprints, and web beacons (together, “Data Collection Tools”) when you access and use the Website. These Data Collection Tools automatically track and collect certain System Data and Usage Data (as detailed in Section 1) when you use the Website. In some cases, we tie data gathered through those Data Collection Tools to other data that we collect as described in this Privacy Policy.

### 2.2. Why We Use Data Collection Tools

Hardware Wallet uses the following types of Data Collection Tools for the purposes described:

**Strictly Necessary:** These Data Collection Tools enable you to access our Website, provide basic functionality (like accessing content), and secure our Website. These are required for the Website to work properly, so if you disable them, parts of the site may break or be unavailable.

**Functional:** These Data Collection Tools remember data about your browser and your preferences, provide additional site functionality.

**Advertising:** These Data Collection Tools are used to deliver relevant ads (on our websites) based on things we know about you like your Usage and System Data (as detailed in Section 1), and things that the ad service providers know about you based on their tracking data. The ads can be based on your recent activity or activity over time and across other sites and Website.

**Social Media:** These Data Collection Tools enable social media functionality, like sharing content with friends and networks. These cookies may track a user or device across other sites and build a profile of user interests for targeted advertising purposes.

**Regulatory Compliance:** These Data Collection Tools are used so we can provide our Website by adhering to any and all needed legal requirements and obligations.

You can set your web browser to alert you about attempts to place cookies on your computer, limit the types of cookies you allow, or refuse cookies altogether. If you do, you may not be able to use some or all features of the Website, and your experience may be different or less functional. To learn more about managing Data Collection Tools, refer to Section 6.2 (Your Choices About the Use of Your Data) below.

### 3. What We Use Data For

We use your data to do things like provide our Website and/or our content, notify you of 1inch Hardware Wallet sale start, communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Website, analyze how people use our Website, serve personalized advertising, and as required by law or necessary for safety and integrity.

We use the data we collect through your use of our Website to:

- Provide and administer our Website, including displaying customized content, and facilitating communication with other users;
- Process your requests and orders for information or features;
- Solicit feedback from users;
- Market products, Website, surveys, and promotions;
- Learn more about you by linking your data with additional data through third-party data providers and/or analyzing the data with the help of analytics service providers;
- Identify unique users across devices;
- Tailor advertisements across devices;
- Analyze trends and traffic, track purchases, and track usage data;
- Advertise our Website on third-party websites and applications;
- As required or permitted by law; or
- As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Website.

### 4. Who We Share Your Data With

We share certain data about you with our business partners and persons who may support us while we provide our Website, Hardware Wallet affiliates, our analytics and data enrichment providers, your social media providers, companies helping us run promotions and surveys, and advertising companies who help us promote our Website. We may also share your data as needed for security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.

We may share your data with third parties under the following circumstances or as otherwise described in this Privacy Policy:

- **With Service Providers, Contractors, and Agents:** We share your data with third-party companies who perform Website on our behalf, like fraud and abuse prevention, data

analysis, marketing and advertising Website (including retargeted advertising), email and hosting Website, and customer Website and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service.

- With Hardware Wallet Affiliates: We may share your data within our corporate family of companies related by common ownership or control to enable or support us in providing the Website.
- To Power Social Media Features: The social media features (like the Facebook Like button) may allow the third-party social media provider to collect things like your IP address and which page of the Website you're visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the third-party company's privacy policy.
- To Administer Promotions and Surveys: We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law (like to provide a winners list or make required filings), or in accordance with the rules of the promotion or survey.
- For Advertising: If we decide to use an advertising-supported revenue model in the future, we may use and share certain System Data and Usage Data with third-party advertisers and networks to show general demographic and preference information among our users. We may also allow advertisers to collect System Data through Data Collection Tools (as detailed in Section 2.1), to use this data to offer you targeted ad delivery to personalize your user experience (through behavioural advertising), and to undertake web analytics. Advertisers may also share with us the data they collect about you. To learn more or opt out from participating ad networks' behavioural advertising, see Section 6.2 (Your Choices About the Use of Your Data) below. Note that if you opt out, you'll continue to be served generic ads.
- For Security and Legal Compliance: We may disclose your data to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:
  - Permitted or required by law;
  - Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
  - Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid requests;
  - Reasonably necessary to enforce our Privacy Policy and other legal agreements;
  - Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues; or
  - Reasonably necessary in our discretion to protect against imminent harm to the rights, property, or safety of Hardware Wallet, our users, employees, members of the public, or our Website.
  - We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy.
- During a Change in Control: If Hardware Wallet undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organization during such transition or in contemplation of a transition (including during due diligence).
- After Aggregation/De-identification: We may disclose or use aggregated or de-identified data for any purpose.

- **With Your Permission:** With your consent, we may share data to third parties outside the scope of this Privacy Policy.

## 5. Security

We use appropriate security based on the type and sensitivity of data being stored. As with any internet-enabled system, there is always a risk of unauthorized access, so it's important to protect your password and to contact us if you suspect any unauthorized access to your account.

Hardware Wallet takes appropriate security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so we cannot guarantee that communications between you and Hardware Wallet, the Website, or any information provided to us in connection with the data we collect through the Website will be free from unauthorized access by third parties.

Also, to keep you fully informed, your personal is to be stored in a database secured by our cloud third-party external providers. Hardware Wallet has a business continuity procedure, assuring the redundancy of its systems. Hardware Wallet's system servers are located in Central Europe.

## 6. Your Rights

You have certain rights around the use of your data, including the ability to opt out of promotional emails, cookies, and collection of your data by certain third parties. You can update or terminate your account from within our Website and can also contact us for individual rights requests about your personal data. Parents who believe we've unintentionally collected personal data about their underage child should contact us for help deleting that information.

### 6.1. Your GDPR Rights

Under certain circumstances, you may have a number of privacy rights concerning the use, storage, and processing of your personal data (e.g., the right to delete your data). Here is a list of privacy rights:

- **right to be informed** – we are publishing this Privacy Policy to keep you informed as to what we do with your personal data. You can ask us for information regarding any data of yours that we keep at any time. This information concerns, among other things, the data categories we process, for what purposes we process them, the origin of the data if we did not acquire them directly from you and, if applicable, the recipients to whom we have sent your data.
- **right of access** – you may ask us whether we process your personal data and you have the right to request a copy of the information we hold about you.
- **right of rectification** – you have the right to correct inaccurate or incomplete data about you.

- right to be forgotten – you can ask for the information that we hold about you to be erased from our system and we will comply with this request unless we will have a legitimate reason not to do so.
- right to restriction of processing – where certain conditions apply, you can ask us to ‘block’ the processing of your data.
- right to data portability – you have the right to have the data we hold about you transferred to another organization and to receive personal data in a structured, commonly used format. Please apply at [info@hwlt.io](mailto:info@hwlt.io) to find out whether we currently support the provision of the portable file containing personal data we process about you.
- right to object – you can object to the processing of your data at any time for reasons that arise from your special situation provided the data processing is based on your consent or our legitimate interest or that of a third party. In this case, we will no longer process your data. The latter does not apply if we are able to prove there are compelling, defensible reasons for the processing that outweigh your interests or we require your data to assert, exercise or defend against legal claims.
- right to withdraw consent – withdraw the consent you gave us with regard to the processing of your personal data for certain purposes.
- right to complain – we take your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately, you have the right to submit a complaint to the data privacy protection authorities responsible.

Please email at [info@hwlt.io](mailto:info@hwlt.io) with any questions about exercising any of the above rights. If you wish to learn more about the GDPR and your rights, the [Information Commissioner’s Office](#) website is a reliable source.

## 6.2. Your Choices About the Use of Your Data

You can choose not to provide certain data to us, but you may not be able to use certain features of the Website.

- To stop receiving promotional communications from us, you can opt out by using the unsubscribe mechanism in the promotional communication you receive or by changing the email preferences in your account. Note that regardless of your email preference settings, we will send you transactional and relationship messages regarding the Website, including administrative confirmations, order confirmations, important updates about the Website, and notices about our policies.
- If you’re located in the European Economic Area, you may opt out of certain Data Collection Tools by clicking the “Cookie settings” link.
- The browser or device you use may allow you to control cookies and other types of local data storage. To learn more about managing cookies, visit <https://cookiepedia.co.uk/how-to-manage-cookies>. Your wireless device may also allow you to control whether location or other data is collected and shared.
- Apple iOS, Android OS, and Microsoft Windows each provide their own instructions on how to control in-app tailored advertising. For other devices and operating systems, you should review your privacy settings on that platform.

## 6.3. Our Policy Concerning Children

We recognize the privacy interests of children and encourage parents and guardians to take an active role in their children's online activities and interests. Individuals younger than 18 years of age, but of the required age for consent to use online Website where they live (for example, 13 in the US or 16 in Ireland), may not set up an account. Individuals younger than the required age for consent to use online Website may not use the Website. If we learn that we've collected personal data from a child under those ages, we will take reasonable steps to delete it.

Parents who believe that Hardware Wallet may have collected personal data from a child under those ages can submit a request that it be removed to [info@hwlt.io](mailto:info@hwlt.io).

#### 6.4. Users in California

Users who are California residents have certain rights under the California Consumer Privacy Act, ("CCPA"). If you are an eligible California user, included in these rights are:

- "Right to Know" — You have the right to request to know more about the categories and specific pieces of personal information that we have collected about you and access a copy of your personal information.
- "Right to Deletion" — You have the right to request deletion of personal information that we have collected about you.
- "Right to Non-Discrimination" — If you choose to exercise any of your rights under CCPA, HARDWARE WALLET will treat you like all other users. In other words, there is no penalty for exercising your rights under CCPA.
- "Right to Opt-Out" - You have the right to opt out of the sale of your personal information.

CCPA has a specific definition of a "sale" and while Hardware Wallet does not, in the traditional sense, sell your personal information or the personal information of any of our users, we do use cookies that make non-personally identifiable information available to select third-parties.

To exercise any of these rights under CCPA, please email [info@hwlt.io](mailto:info@hwlt.io). CCPA allows you to designate an authorized agent to make these requests on your behalf. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify you and/or your agent's identity before fulfilling your request.

Additionally, for more information about the personal information we collect and how we collect it, please see the sections above entitled "What Data We Get" and "How We Get Data About You."

To learn about the business and commercial purposes for which your personal information is collected and the categories of service providers who have access to your personal information, please see the sections above entitled "What We Use Your Data For" and "Who We Share Your Data With."

Since there is no widely accepted standard for the browser-initiated Do Not Track signal, we do not currently recognize or respond to Do Not Track signals.



## 7. Changes to this Privacy Policy

We reserve the exclusive right to make changes to this Privacy Policy from time to time, in our sole discretion. Your continued access to and use of the Website constitutes your agreement to be bound by specific terms of this Privacy Policy posted at such time. You acknowledge and agree that you accept this Privacy Policy (and any amendments hereto) each time you access the Website in any manner. Therefore, we encourage you to review this Privacy Policy regularly as you shall be bound by it.

If, within thirty (30) days of posting changes or amendments to this Privacy Policy, you decide that you do not agree to the updated terms of the Privacy Policy, you may provide us with written notice of your withdrawal from this Privacy Policy to the email address at [info@hwlt.io](mailto:info@hwlt.io) . Upon providing us with the written notice of the withdrawal of your acceptance to this Privacy Policy, you shall no longer be authorized to access or use the Interface, and you must immediately cease in doing so.