

# HADE PLATFORM PRIVACY POLICY

Last updated: 11/19/2017

## SECTION 1. PURPOSE OF THIS POLICY

At HADE Technologies, LLC, we are committed to keeping Your information safe and secure. Please read the following Policy so that You understand Your rights in relation to this information, including how Your information will be collected, used and processed.

In providing you with our services, we naturally collect information about you. This Privacy Policy (“**Privacy Policy**”) sets out what information We collect, how we use that information, who We might share it with, and the steps We take to make sure it stays private and secure.

In this policy, where we say “You” or “Your”, this means You – the person who uses the Website and/or purchases any products or services, including HPAY Tokens via the Website and/or creates the Account on the Website. Wherever we’ve said “We”, “Us” or “Our”, this means the HADE team as mentioned on the Website.

References in this policy to your “**personal data**” describes information that can be associated with a specific person (the “**User**”) and can be used to identify that person (including information about Your activities, such as information about Your use of our online services, when directly linked to personally identifiable information, including automatically collected).

Please read the following information carefully to understand our practices regarding your personal data and usage information and how we will use it. By continuing to use our Services, including browsing the website, creating an account and/or purchasing HPAY Tokens, you acknowledge that you have read, understood and accepted the information described in this policy. If any user does not agree with this policy in general or any part of it, such user should not access the website and/or create the account and/or purchase HPAY Tokens. The HADE Technologies Tokens Sale General Terms & Conditions, as well as HPAY Token Sale Policy govern the relationship between Us and You, and can be found on the Website.

Definitions used in this Policy with a capital letter, will have the meaning which is set out in HADE Technologies General Terms & Conditions.

## COLLECTION, PROCESSING AND USE OF YOUR INFORMATION

The personal data we collect or have about you may come from different sources. Some of it will be provided by you and others will be collected from your activity on our website and/or use of our services. We may collect and use the following information about You:

When you visit the website (including the mobile version), even if you have not yet created an account with us, we collect the information sent to us by your computer, mobile phone, or other access device. This information includes:

- Your IP address;
- Device information including, but not limited to, identifier, name, and type of operating system;
- Mobile network information;

- Standard web information, such as Your browser type and the pages You access on Our Website.

We collect this information to administer our website, block users from access to the Website if such users are in certain jurisdictions where the HPAY Token Sale is restricted or not permitted according to Our policies, personalize Our Website for You, monitor and analyze trends, usage and activity about Our Website and services and provide third parties with aggregated and anonymized statistical information about our Users.

When you access the website, or Use Our products or services we may place small data files called cookies on Your computer or other device. We use these technologies to recognize you as our user, customize our website and to monitor usage.

When you create an account with us, purchase services, and/or apply for purchase of HPAY Tokens, in addition to the information collected when you access our website, we also collect:

- Your name
- Your email
- Full name (First and Last name);
- Detailed address (including country, zip code, city, street)
- Date of birth
- Social Security Number

We collect this information to:

- Verify your identity;
- Check Your special eligibility status for HPAY Token Sale participation (i.e. absence in the list of banned jurisdictions, OFAC sanctions list, check accredited investor status, etc.);
- Administer our website and provide services;
- Personalize our website for You;
- Send you technical notices, support, administrative and marketing messages;
- Communicate with you about products, services, promotions, events and other news and information we think will be of interest to You;
- Monitor and analyze trends, usage and activities about our website and services;
- Provide third parties with statistical information about Our Users (but those third parties will not be able to identify any individual User from that information);
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Website Owner and others;
  - Strictly follow generally applied and recognized KYC and AML rules and policies;
  - Link or combine personal data We collect from or about You; and

- Verify compliance with the Terms and Conditions and Tokens Sale Policy governing the use of our website.

In certain cases (when additional verification by a bank or compliance authority is needed to comply with governmental rules, anti-money laundering (AML) or “know-your-customer”

(KYC) policies), we may require you to provide additional information including:

- Passport or driver license details;
- Numbers that you may use or have registered with your local tax authority;
- Utility bills;
- Photographs of you;
- Confirmation of proceeds sources;
- Sworn statements;
- Documents that prove incorporation of a legal entity and verify their beneficial owner, including full details of such beneficial owner (if a User represents a legal entity).

We are sometimes required to compare the personal data you provide to third party databases to verify its accuracy and confirm Your identity to comply with relevant anti-money laundering (AML) regulations and “know your customer” (KYC) regulations.

We may use Your personal data and other information We collect to detect, investigate and prevent fraudulent transactions and other illegal activities, develop new products and services and to verify compliance with Our Terms and Conditions and Tokens Sale Policy.

If You do not provide Us with any personal data requested, you may not be able to create an Account or purchase or dispose of HPAY Tokens. We do not bear any liability if You are unable to purchase or dispose of HPAY Tokens.

We may refuse You access to Our Services and Website should We, in good faith, have doubts as to validity or authenticity of any personal data You provide.

We use the IP address which connects to Our Services to determine geographic location. In addition, when You use a location-enabled device to access Our Website and Services, we may collect geographical location data or use various means to determine the location, such as sensor data from Your device that may, for instance, provide data on nearby cell towers and wi-fi access spots. We do this so that we can verify Your location to ensure compliance with applicable laws including AML and KYC rules.

We use cookies and other similar technologies (e.g. web beacons, Flash cookies, etc.) (“**Cookies**”) to enhance Your experience using the Website. Cookies are small text files that are placed on Your computer by websites that You visit. They are widely used in to make websites work, or work more efficiently, and to deliver a better and more personalized service. Cookies may be either "persistent" Cookies or "session" Cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain

valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

We use the following Cookies:

- **Strictly necessary Cookies.** These are Cookies that are required for the operation of the Website.
- **Analytical/performance Cookies.** They allow Us to recognize and count the number of Users and to see how Users move around the Website when they are using it. This helps Us to improve the way the Website works. We use Google Analytics which is a web analytics tool that helps Us understand how Users engage with the Website. Like many services, Google Analytics uses first-party cookies to track User interactions as in Our case, where they are used to collect information about how Users use Our Website and how they use it. This information is used to compile reports and to help Us improve Our Website. The reports disclose Website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our website – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page.
- **Functionality Cookies.** These are used to recognize You when You return to the Website. This enables Us to personalize Our content for You (for example, Your choice of language).

You can find more information about Cookies and how to manage them at <http://www.allaboutcookies.org/>. You may control the use of Cookies within your internet browsers' settings. If you reject or delete certain Cookies, be aware that the performance of the related features and functions of Our Website and services may be impaired.

## SECTION 4. HOW WE MIGHT SHARE YOUR PERSONAL DATA

### 4.1 We May Share Your Personal Data Where:

- We need to operate Our Services, including the purchase of HPAY Tokens.
- We have a public or legal duty to do so (e.g. to assist with detecting fraud, tax evasion, financial crime prevention, regulatory reporting, litigation or defending legal rights and property, including our own).
- We have asked for Your permission to share Your information and You have agreed

### We May Share Your Personal Data and Information With:

- Our banking and brokerage partners;
- Our partners, engaged to verify Your identity or special eligibility status;
- Companies that We plan to merge with or be acquired by (should such a combination occur, we will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
- Third party identification service providers for AML and KYC purposes;
- Law enforcement, government officials, or other third parties when We are compelled to do so by a subpoena, court order, or similar legal procedure; or We believe in good faith

that the disclosure of personal data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of Our policies;

- Our vendors and agents including hosting providers, hired by us to provide services.

#### **What We Will Not Use Your Personal Data For:**

- We will not provide Your personal data to any other Website users or third parties other than described in this Policy without notifying You first.
- We will not sell or rent Your personal data to third parties, other than as described in this Policy without notifying You first.

#### **Links to Third Party Websites:**

- Our Website may, from time to time, contain links to and from the websites of Our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised).
- If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any information, including personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before You submit any information or personal data to these websites or use these services.

#### **Keeping your information safe**

- We protect Your personal data using security standards such as firewalls and data encryption, physical access controls to Our premises and information access authorization controls. We also authorize access to personal data only for those employees or contractors who require it to fulfill their job or service responsibilities.
- Please note that transmission of data or information (including communications by e-mail) over the internet or other publicly accessible networks is not one hundred percent secure. Please note that We are not liable for the security of any data you are transmitting over the internet.

#### **YOUR RIGHTS**

You may access, review and edit Your Personal Data at any time by logging in to Your Account using your credentials. European users may have a right under applicable privacy laws to ask Us to provide details of the personal data we hold about them or in certain circumstances, may request we delete their personal data. To exercise these rights, please contact Us via the Website contact form.

#### **UPDATES OR AMENDMENTS TO THIS POLICY**

We reserve the right to modify or amend this Policy at Our discretion. Any changes can be viewed in the “Last Updated” field above, so please check the section regularly.

#### **CONTACT**

If You have questions concerning this policy, please feel free to send us the respective message using the respective contact form on the website.

