HACKEN.IO

Privacy Policy

Last Updated: October 30, 2017

This Privacy Policy explains how information is collected, used and disclosed by Hacken project – Gretto Group Ltd., company, incorporated in the jurisdiction of the British Virgin Islands (hereinafter – "**Hacken**", "**we**", or "**us**"), before using the Website "https://hacken.io/" or any services or products made available through this Website (collectively, the "**Services**"), or when you otherwise interact with us. Our Services include the Website and/or any services or products made available through the Website that will issue its internal tokens called Hacken Tokens (hereinafter – "**HKN Tokens**" or "**HKN**") which will be used as the only payment tool accepted inside the Hacken Ecosystem (hereinafter – the "**Platform**"). For details about the information We may collect about you or your device, please read further. PLEASE NOTE THAT, YOU CAN NOT USE THE PLATFORM UNTIL YOU WILL GIVE YOUR EXPLICIT CONSENT WITH THE PROVISION OF THIS AGREEMENT BY TECHNICALLY SIGN IT.

1. DEFINITIONS

Personally identifiable information (hereinafter – "**personal information**" or "**information**") is any information that can be directly associated with a specific person and can be used to identify that person. This information you actively provide to us.

Buyer, User, you – anyone who uses or planning to use the Services or the Platform. Where You is any person, who uses the Platform or its Services, without prior registration and authorization. User is any person, who uses the Platform or its Services, with prior registration and authorization. Buyer is any person, who uses the Platform or its Services, to purchase HKN.

2. COLLECTION OF INFORMATION

Information You Provide to Us

We may collect information you provide directly to us. For example, we collect information you provide when you subscribe to our updates, authorize or register to our Website, respond to a survey, fill out any form, request customer support or communicate with us. The types of information we may collect include your ETH-address or other similar address, IP address, email address, browser type, pages accessed on our website, date and time the website was accessed, survey responses and any other information you choose to provide. We also may collect information about a user's computer or other access devices for fraud prevention purposes.

If you use the Platform, Hacken or our third-party service provider may collect your payment method information for use in connection with your payments.

Hacken does not process any sensitive personal information, such as religion, race, ethnicity and/or political views.

Information We Collect Automatically

When you use our Services, we automatically collect information from your devices. For example, we may collect:

· **Log Information:** information that you provide to us when registering with our Services, including access times, pages views, IP address, and the website navigation paths.

· **Device Information**: We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, your web browser, and device identifiers (including a network ID used to communicate with other nodes on the platform).

· **Usage Information**: If you use Hacken, we will collect information contained in or relating to any communication that you send to us or send through Hacken (including shard size, number of shards and frequency of access), and metadata associated with the communication. The usage information also includes your interactions with Services, device information, such as unique device identifiers, operating system information, internet service provider, IP address, screen resolution, language, the date and time of each of your log-ins and requests.

· **Information Collected by Cookies and Other Tracking Technologies via Hacken**: We use cookies on Hacken to collect information about your visit and to allow you to navigate from page to page without having to re-login each time, count visits, and see which areas and features of our website or any services made available through Hacken are popular. Cookies are small text files that are usually stored on computer's hard drive by websites that you visit. With this knowledge, we can improve the quality of your experience with or services by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties. Web beacons (or pixel tags) are electronic images that may be used in our web Services or emails to help deliver cookies, count website visits, understand usage and determine the effectiveness of email marketing campaigns.

Our use of cookies and other technologies may allow us and third parties to collect information about your browsing activities over time and across different websites following your use of our Services.

Information We Collect from Other Sources

To provide you with the best Services possible, we also use third party service providers, which we entrust storing data, its collection and analysis. We believe that all third party service providers are important to our effective operation. They have their own privacy policies and their own conditions, whether to collect your data or opt-out from it. Thus, we do recommend You to getting yourself acquainted with the terms of third party service provider, if You use other services on our Platform. We will not seek any of your Personal Information through any other software platforms, data web resources etc., even if this information is necessary for You or your usage of the Platform.

Why we collect personal information

Our primary purpose for collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. In particular, we may use your personal information to:

- provide the Services and customer support per your request;

- process transactions and send notices about your transactions;

- resolve disputes, collect fees, and troubleshoot problems;

- prevent potentially prohibited or illegal activities, and enforce our Terms and Conditions;

- customize, measure, and improve the Services and the content and layout of our website and applications;

- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;

- compare information for accuracy and verify it with third parties;

- distribute and account HKN Tokens.

3.   USE OF INFORMATION

We collect and use your personal information to operate our Services and deliver the Services you have requested. We only store your information for no longer than is required for the purposes for which the information may be used. In addition, we have the right to compile your personal information, as well as remove it from the Platform.

We may use information about you for various purposes, including to:

- Administer our Services;

- Develop new products and services;

- Personalise Hacken Project for you;

- Send you technical notices and support and administrative messages;

- Communicate with you about products, services, promotions, events and other news and information we think will be of interest to you;

- Monitor and analyse trends, usage and activities in connection with our 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 Hacken project and others;

- Link or combine information we collect from or about you; and

- Verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

4. SHARING INFORMATION

We may share your personal information with:

- other HKN entities, in order to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services and communications;

- service providers that perform work for us (such as hosting providers, identity verification, support, payment, and email service providers);

- in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;

- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of HKN or others;

- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;

- between and among Company and its current and future parents, affiliates, subsidiaries and other companies under common control and ownership; or

- when we believe, in our sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations of our Terms and Conditions.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

5. AML/KYC POLICY

Hacken is committed to implementing and maintaining the highest standards of Know Your Customer (KYC) and Anti Money Laundering (AML) compliance and requires management and employees to adhere to these standards to prevent abuse of Hacken Services for money laundering and terrorist financing purposes.

In pursuing its commitment to assist in the detection, prevention, and reporting of money laundering activities, Hacken shall:

(i) implement a risk based approach to assessing and implementing AML and KYC procedures.

(ii) know its customers by obtaining satisfactory evidence of their identity and having effective procedures to verify the authenticity of the information furnished by new customers.

(iii) ensure that its business is conducted in conformity with high ethical standards, that laws and regulations are adhered to, and that service is not provided where there is good reason to believe that transactions are associated with money laundering activities.

(iv) cooperate fully with law enforcement agencies by, among others, taking appropriate measures allowed by law if there are reasonable grounds for suspecting money laundering.

(v) adopt policies consistent with the principles set out in this policy, and ensure that its staff, wherever located, are informed of these policies and adequately trained in matters covered herein.

(vi) implement specific procedures for customer identification, record keeping and retention of transaction documents and reporting of covered and suspicious transactions.

To prevent abuse of Hacken Services for money laundering and terrorist financing purposes We reserve the right to request the documents and the following information:

- Photo of Your Passport of other Identity Card to show Proof of Identity;

- Documentation that evidences your Proof of Address;

- Name;

- Telephone Number;

- E-mail address.

6. CORRECT/UPDATE/REMOVE INFORMATION

You have right to access to your personal information and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting us, please email us at legal@hacken.io. Nevertheless, this request must comply with Terms and Conditions and other legal obligations that may arise. Upon the accepted request, we will provide you with the personal information that we collect and store about you and general disclosure of your personal information. To disable your account and remove your personal information completely, please email us at legal@hacken.io with a request that complies with HKN Terms and Conditions.

7. RETAIN INFORMATION

In accordance with applicable laws and as needed to provide services to our Users, we may hold your personal information. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain your personal information so long as your account is active. Moreover, your information may be hold beyond the abovementioned period till it is indispensable for us to have relevant information to respond to any issues that may arise later.

8. MARKETING

We do not sell, rent or lease your personal information and/or customer lists to third parties without your explicit consent. We may combine your information with information we collect from other sources and use it to improve and personalize the Hacken Services, content, and advertising.

9.   ANALYTICS SERVICES PROVIDED BY OTHERS

We may allow others to provide analytics services on our behalf in connection with our Services. These entities may use cookies and other technologies to collect information about your use of the Services and other websites and apps (if any), including your IP address, web browser, pages views, app performance, time spent on pages and links clicked. This information may be used by Hacken and others to, among other things, analyze and track data, determine the popularity of certain content and better understand your online activity.

10.   SECURITY

We use relevant electronic and procedural safeguards to protect the privacy of the information you provide to Company from loss, misuse, disclosure, alteration and destruction. 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, or third party content as well as for any of your losses associated with such transmission.

All HKN operations on the Platform, including but not limited to those between user accounts, are written into Blockchain register with compulsory and automated hash entry into the chain of blocks. Blockchain security is provided by data records of all HKN movements from one account to another, with the obligatory and automatic hash recording into the Blockchain. The flow-of-funds record is open to the public. However, the registry information is unchangeable and anonymous.

11.   NOTICE TO PARENTS

Parents or guardians: We want to help You guard your children's privacy. We encourage You to talk to your children about safe and responsible use of their and your personal information while using Internet. Company's web-resources and web-resources of our affiliates, licensees, agents etc. in the part they use under our license or assignment does not publish any data that is targeted to children. So, that We advice you to refrain your children from using web-resources, mentioned in this paragraph and ask them not to use them. However, we ask you to pay attention that all and any actions taken under your registration data in the Company's web-resources and web-resources of our Licensees, Agents etc. shall be considered to be taken by you namely.

12.   CHANGES TO THIS POLICY

We may amend this policy at any time by posting a revised version on our Website. The revised version will be effective at the time we post it. In addition, if the revised version includes any substantial changes to the manner in which your personal information will be processed, we will provide you with prior notice by posting notification of the change on the "Privacy Policy" area of our website or any Services made available through our Website.

We encourage you to periodically check this page for the latest information on our privacy policy.

13.   CONTACT US

If you have questions concerning this Privacy Policy, or you notice any bugs, errors or violations, please feel free to send us an email at legal@hacken.io.